STATE OF NEW HAMPSHIRE
Department of Environmental Services
Air Resources Division

TITLE V OPERATING PERMIT

Permit No: **TV-OP-040**
Date Issued: **January 17, 2002**

This certifies that:
Groveton Paper Board Inc.
A1 Mechanic Street
Groveton, NH 03582

has been granted a Title V Operating Permit for the following facility and location:
Groveton Paper Board Inc.
A1 Mechanic Street
Groveton, NH 03582
AFS Point Source Number - 3300700093

This Title V Operating Permit is hereby issued pursuant to RSA 125-C and Part Env-A 609. This permit has been prepared based on information specified in the Title V Operating Permit Application filed with the New Hampshire Department of Environmental Services (DES) on **July 2, 1996** and subsequent information submitted on **July 5, 2000,** under the signature of the permittee's responsible official certifying to the best of their knowledge that the statements and information therein are true, accurate and complete.

Responsible Official:
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Environ. Affairs & Technical Specialist
(603) 636-3005

This Permit is issued by the New Hampshire Department of Environmental Services, Air Resources Division pursuant to its authority under New Hampshire RSA 125-C and in accordance with the provisions of Code of the Federal Regulations 40 Part 70.

This Title V Operating Permit shall expire on **January 31, 2007.**

SEE ATTACHED SHEETS FOR ADDITIONAL PERMIT CONDITIONS

For the New Hampshire Department of Environmental Services, Air Resources Division

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Director, Air Resources Division

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ABBREVIATIONS

AAL	Ambient Air Limit
AP-42	Compilation of Air Pollutant Emission Factors
ARD	Air Resources Division
ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
BHP	Break Horse Power
BTU	British Thermal Units
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CAS	Chemical Abstract Service
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CNG	Compressed Natural Gas
CO	Carbon monoxide
CO_2	Carbon dioxide
COMS	Continuous Opacity Monitoring System
DER	Discrete Emission Reduction
Env-A	New Hampshire Code of Administrative Rules – Air Resources Division
Env-Wm	New Hampshire Code of Administrative Rules – Waste Management Division
ECS	Emission Control System
ERC	Emission Reduction Credit
FR	Federal Register
HAP	Hazardous Air Pollutant
HCl	Hydrochloric acid
Hr	Hour
kGal	1,000 gallons
LAER	Lowest Achievable Emission Rate
lb/hr	Pounds per hour
LNB	Low NO_x Burner
LNG	Liquid Natural Gas
LPG	Liquid Petroleum Gas (Propane)
MACT	Maximum Available Control Technology
mg/L	Milligrams per liter (ppm)
mmBtu	Million British Thermal Units
MMCF	Million Cubic Feet
NAAQS	National Ambient Air Quality Standard
NCCEM	Non-certified Continuous Emissions Monitoring System
NESAPS	National Emissions Standards for Hazardous Air Pollutants
NG	Natural Gas

ABBREVIATIONS (CONT.)

NHDES (or DES)	New Hampshire Department of Environmental Services
NOx	Oxides of Nitrogen
NSPS	New Source Performance Standard
NSR	New Source Review
PCB	Polychlorinated biphenyl
PE	Potential Emission
PM	Particulate Matter
PM_{10}	Particulate Matter less than 10 microns diameter
ppm	part per million
ppmv	part per million by volume
ppmdv	part per million by dry volume
PSD	Prevention of Significant Deterioration
PSI	Pounds per Square Inch
PTE	Potential to Emit
RACT	Reasonably Available Control Technology
RTAP	Regulated Air Toxic Pollutant
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
T-12M	Tons during any consecutive 12-month period
TAP	Toxic Air Pollutant
TSP	Total Suspended Particulate Matter
tpy	Tons per Year
USEPA	United States Environmental Protection Agency
VOC	Volatile Organic Compound

Facility Specific Title V Operating Permit Conditions

I. Facility Description of Operations:

Groveton Paper Board (GPB) is a stand-alone semi-chemical, integrated pulp and paper mill producing approximately 550 tons per day of corrugating medium. Pulp is manufactured from wood chips, using a very mild soda ash/caustic solution, at a rate of about 275 oven dry tons pulp production per day[1]. Pulping chemicals are recovered by burning the spent cooking liquor (black liquor) in a recovery kiln and subsequent dissolution of the ash. GPB owns and operates two, natural gas or No. 6 fuel oil fired Boilers and two combustion turbines equipped with heat recovery steam generator units. Electricity generated by the two combustion turbines is used by the facility for their own consumption in addition to power consumed from outside sources. The primary source of air pollutant emissions at the facility, are generated from fuel-burning devices, which produce criteria pollutant and hazardous air pollutant (HAP) emissions. In addition, methanol and other HAP emissions are generated from the pulping and chemical recovery processes at the facility. Methanol emissions from low volume high concentration sources in the pulp mill and evaporator area are regulated under 40 CFR 63 Subpart S. In addition, methanol emissions from the recovery kiln are regulated under 40 CFR 63 Subpart MM.

The GPB site is also occupied by Wausau Papers of New Hampshire Inc., which manufactures specialty papers derived from market pulp. The two facilities are not under common control and are considered separate and distinct facilities for air pollution control purposes.

The two facilities are served by a common energy plant consisting of four boilers (Boilers #1, #2, #4, & #5) and a steam-driven turbine rated at 6500 kilowatts, with an 8500 kilowatt generator. Boilers #1 and #2, and the small turbine and generator are owned by Wausau, and Boilers #4 and #5 are owned by GPB. The steam plant is currently operated by Wausau for the benefit of both parties under an operating agreement between the two parties, and all four boilers are permitted in Wausau's name as the operating entity via the Title V Operating Permit TV-OP-021, issued on January 26, 2000.

In 1999, the two companies installed the capability to fire natural gas in Boilers #1, #4, and #5; modified the stacks for Boilers #2, #4, and #5; and reduced the sulfur content of oil fired in the Boilers as part of demonstrating compliance with the National Ambient Air Quality Standards for nitrogen oxides.

The operating agreement between the two companies that governs the operation of the steam plant and other site operations will expire in November 2001. This agreement will be modified so that each facility will operate its own energy plant. In conjunction with this separation, in order to provide a reliable steam source for each facility and to reduce electric power costs, each facility will erect a combustion turbine generation facility, which will become the primary source of steam and electricity for each facility. The existing Boilers will be maintained by their respective owners to provide supplementary and backup steam, with the exception that Boiler #2 will be retired and removed from service once a combustion turbine and corresponding heat recovery steam generator are fully operational at one of the two facilities. It is the intention of both parties to have their combustion

[1] Groveton Paper Board does not have any operational limitations on total pulp production. Typical daily production averaged on an annual basis is 275 oven dry tons pulp produced.

turbines and HRSG's operational by November 2001 and to be allowed a reasonable time period for training of GPB operators in safe operation of combustion equipment by the current Wausau operators and any training services and/or consultants hired by GPB. At the time of issuance of the Temporary Permit, GPB assumed responsibility for compliance for Boilers #4 and #5 and the two new Combustion Turbines #1 and #2 plus HRSG's #1 and #2 at its facility. Simultaneous to the issuance of the Temporary Permit to GPB, Wausau was issued a Temporary Permit and assumed responsibility for compliance for Boilers #1 and #2 and its Combustion Turbine and HRSG Unit #1. In addition, at the time of issuance of these two Temporary Permits, all permit conditions applicable to Boilers #1, #2, #4, & #5 contained in the Wausau Title V Operating Permit TV-OP-021 will remain in effect until a combustion turbine and corresponding heat recovery steam generator are fully operational at one of the two facilities.

In its Temporary Permit application, GPB identified it would install two 5.5-6.0 Megawatt gas/oil-fired turbine co-generation systems. Each Combustion Turbine is rated at a maximum of 73.0 mmBtu/hr gross heat input while firing natural gas at 0 degrees F and 70.4 mmBtu/hr gross heat input while firing No. 2 fuel oil at O degrees F. GPB has opted for the use of duct burners for supplemental fuel firing for each of its Heat Recovery Steam Generating Units operated in conjunction with its Combustion Turbine. The duct burners are rated at 84.5 mmBtu/hr gross heat input while firing natural gas only to supply each of the two HRSG Units, when its associated Combustion Turbine is in operation. In addition, in cases where a Combustion Turbine is off-line, the associated HRSG Unit may operate with fresh air makeup in place of heated combustion gases from its Combustion Turbine. In these instances where the Combustion Turbine is out of service, the HRSG Unit duct burner is permitted to operate at 126.9 mmBtu/hr gross heat input rate while firing natural gas.

Steam will be generated to supply process and space heating needs by extracting heat from each of the combustion turbine exhaust gases into a heat recovery boiler. There will be supplementary gas-only firing in the duct leading to each heat recovery boiler from the combustion turbine. All steam and electricity generated by the new equipment will be used by GPB or sold off site. Exhaust gas is vented to the atmosphere from the heat recovery boiler via a new, dedicated stack. In the event that steam requirements are low or if there is a boiler malfunction, the combustion turbine exhaust gas may be directed to a by-pass duct connected to a stack separate from the main Turbine/HRSG main stack.

It should be noted that DES granted a one-year extension to GPB to come into compliance with 40 CFR 63 Subpart S or any approved alternative permit terms under Section 63.94, i.e., by April 15, 2002 (See Compliance Plan in Section VIII. I.). Furthermore, EPA published National Emission Standards for Hazardous Air Pollutants for Chemical recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills (40 CFR 63 Subpart MM) in the Federal Register on January 12, 2001, with a compliance deadline of March 13, 2004. DES has listed applicable requirements from 40 CFR 63 Subpart MM in this Title V Operating Permit, which will be applicable to the GPB facility. Once performance testing is completed for low volume high concentration (LVHC) collection and treatment systems covered by 40 CFR 63 Subpart S and performance testing is completed on the recovery kiln covered by 40 CFR 63 Subpart MM, DES may make permit amendments in accordance with Env-A 612.04 to incorporate operating parameter ranges for various process variables to be monitored as part of the facility's compliance demonstration as required by this Title V Operating Permit.

GPB proposes an alternate control approach to what is required under the pulp and paper NESHAP (40 CFR 63 Subpart S). Instead of reducing HAP emissions from the digester and evaporator vents by 98 percent as required under 63.443(d)(1), GPB proposes to partially control those vents and control an additional HAP emission source to make up the difference in HAP reductions. Groveton plans to use their existing three Nash type vacuum pumps and treat the condensates generated by those pumps

to partially control the digester and evaporator area vents. In early 2002, the mill shall reroute all the digester blow tank direct contact condenser condensate (the additional source not regulated by the subject NESHAP) from use on open processes (brown stock washing and paper machine stock dilution) to controlling them in the wastewater collection and treatment system. While preliminary tests show support for this proposal, by October 15, 2002, GPB shall provide a demonstration through performance testing that the HAP emission reduction achieved after installation of equipment, their alternate control approach reduces digester and evaporator baseline (before vacuum pump control and redirection of the digester blow heat recovery system condensates) emissions on a pound per ton of HAP basis, by more than reducing the digester and evaporator vents by 98 percent. Further and following the subject rule (63.453(a), (m), and (n)), GPB shall develop, demonstrate, and use parameter monitoring for all affected equipment that demonstrates continuous compliance with this alternative control approach by October 15, 2002.

In order for alternative control options to become federally enforceable, there must be a legal mechanism for implementing the described alternative. There are two implementing mechanisms, a site-specific rule change to 40 CFR 63 Subpart S done by the EPA or an equivalency by permit (EBP) pursuant to 40 CFR 63, Subpart E. DES has chosen the EBP approach for the implementing mechanism to incorporate the alternative control option and its corresponding operating limitations, emissions limitations, monitoring, testing, performance test, record keeping, and reporting requirements contained in this Title V Operating Permit.

On May 16, 2001, EPA issued a direct final rulemaking which granted New Hampshire the authority to implement and enforce alternative requirements for GPB in the form of Title V permit terms and conditions after EPA has approved the New Hampshire's alternative requirements. The requirement applicable to GPB remains the pulp and paper NESHAP (40 CFR 63 Subpart S) until EPA has approved the alternative permit terms and conditions and the final title V permit is issued.

II. Permitted Activities:

In accordance with all of the applicable requirements identified in the Permit, the Permittee is authorized to operate the devices and/or processes identified in Sections III, IV, V, and VI within the terms and conditions specified in this permit.

III. Significant Activities Identification:

A. Significant Activities:

The activities identified in Table 1 are subject to and regulated by this Title V Operating Permit.

Table 1 – Significant Activity Identification

Emission Unit Number	Description of Emission Unit	Emissions Unit Maximum Permitted Capacity
EU1	Boiler #4	107 mmBtu/hr while firing natural gas or No. 6 fuel oil with a maximum sulfur content of 0.5% sulfur by weight
EU2	Boiler #5	107 mmBtu/hr while firing natural gas or No. 6 fuel oil with a maximum sulfur content of 0.5% sulfur by weight
EU3	Combustion Turbine #1	73.0 mmBtu/hr while firing natural gas at O deg F or 70.4 mmBtu/hr while firing No. 2 fuel oil at 0 deg F with a maximum sulfur content of 0.4% sulfur by weight
EU4	Combustion Turbine #2	73.0 mmBtu/hr while firing natural gas at O deg F or 70.4 mmBtu/hr while firing No. 2 fuel oil at 0 deg F with a maximum sulfur content of 0.4% sulfur by weight
EU5	Heat Recovery Steam Generating Unit #1	84.5 mmBtu/hr duct burner firing natural gas supplying heat input to the heat recovery steam generating unit when Combustion Turbine #1 is in service and 126.9 mmBtu/hr duct burner firing natural gas to the heat recovery steam generating unit when the Combustion Turbine #1 is out of service
EU6	Heat Recovery Steam Generating Unit #2	84.5 mmBtu/hr duct burner firing natural gas supplying heat input to the heat recovery steam generating unit when Combustion Turbine #2 is in service and 126.9 mmBtu/hr duct burner firing natural gas to the heat recovery steam generating unit when the Combustion Turbine #2 is out of service
EU7	Recovery Kiln (40 CFR 63 Subpart MM)	5800 pounds of spent liquor solids per hour, equivalent to 990 gallons per hour of strong spent liquor having a density of 10.65 lb/gal and a maximum of 55% solids
EU8	Pulp Mill Blow Heat Recovery System (LVHC source) (40 CFR 63 Subpart S)	Not Applicable
EU9	(2) Evaporator Area LVHC Sources (Nash type vacuum pumps) (40 CFR 63 Subpart S)	Not Applicable
EU10	Kraft Pulper Exhaust (Stack ID 25)	Not Applicable
EU11	Paper Machine Dry End Exhaust (Stack ID 28)	Not Applicable

Table 1 – Significant Activity Identification		
Emission Unit Number	**Description of Emission Unit**	**Emissions Unit Maximum Permitted Capacity**
EU12	Paper Machine Dry End Exhaust (Stack ID 29)	Not Applicable
EU13	Paper Machine Hood Exhaust (Stack ID 30)	Not Applicable
EU14	Paper Machine Wet End Exhaust (Stack ID 31)	Not Applicable
EU15	Paper Machine Saveall Exhaust (Stack ID 37)	Not Applicable
EU16	Paper Machine Vacuum Pump Exhaust (Stack ID 38)	Not Applicable
EU17	Paper Machine Vacuum Pump Exhaust (Stack ID 39)	Not Applicable
EU18	Filtrate Tank Vent (Stack ID 43)	Not Applicable
EU19	#1 Brown Stock Washer Exhaust (Stack ID 44)	Not Applicable
EU20	#2 Brown Stock Washer Exhaust (Stack ID 45)	Not Applicable
EU21	#3 Brown Stock Washer Exhaust (Stack ID 46)	Not Applicable
EU22	Wet End Vapor Vent	Not Applicable

B. Stack Criteria:

The following stacks discharge vertically without obstruction (including rain caps) and meet the following criteria in accordance with the state-only modeling requirements specified in Env-A 1400:

Table 2 – Stack Criteria

Device/Stack #	Minimum Stack Height (feet)	Maximum Stack Diameter (feet)
Boilers #4 & #5 (Common stack)	135.0	6.0
Comb. Turb/HRSG #1 And Comb. Turb/HRSG #2	135.0	5.58 (Combined Stack)
Recovery Kiln	127.0	2.95

Air dispersion modeling conducted by the facility for a separate turbine bypass exhaust discharging at 65 feet elevation and 4 feet in diameter, for each of the turbines indicates this activity must be limited to less than 3 hours per 24 hour period, which would be well within range of a normal startup or shutdown of the turbines. This 3 hour limit only applies when both GPB Turbines are running on oil at the same time and Boilers 1, 4, and 5 are running on No. 6 fuel oil at maximum load.

The facility was modeled for a combined stack including both turbine/HRSG Units in one stack and found to meet all of the National Ambient Air Quality Standards (NAAQS).

Preauthorized changes to the state-only requirements pertaining to stack parameters (set forth in this permit), shall be permitted only when an air quality impact analysis which meets the criteria of Env-A 606 is performed either by the facility or the DES (if requested by facility in writing) in accordance with the "DES Policy and Procedure for Air Quality Impact Modeling". All air modeling data shall be kept on file at the facility for review by the DES upon request.

IV. Insignificant Activities Identification:

All activities at this facility that meet the criteria identified in the New Hampshire Rules Governing the Control of Air Pollution Part Env-A 609.03(g), shall be considered insignificant activities. Emissions from the insignificant activities shall be included in the total facility emissions for the emission-based fee calculation described in Section XXIII of this Permit.

V. Exempt Activities Identification:

All activities identified in the New Hampshire Rules Governing the Control of Air Pollution Part Env-A 609.03(c), shall be considered exempt activities and shall not be included in the total facility emissions for the emission based fee calculation described in Section XXIII of this permit.

VI. Pollution Control Equipment/Technique Identification:

The devices identified in Table 3 below, are considered pollution control equipment for each identified activity.

Table 3 – Pollution Control Equipment Identification			
Pollution Control Equipment Number (PCE#)	**Emission Unit Number**	**Description of Equipment**	**Activity**
PC1	EU7	Peabody Wet Venturi Scrubber and Peabody Wet Electrostatic Precipitator	Controls particulate matter emissions from the Recovery Kiln.
PC2	EU8	Direct Contact Condenser Installed: 1970	Controls methanol emissions from the blow tank.
PC3	EU8	Blow Heat Recovery System Nash Type Vacuum Pump Model: 1001-4 Installed: 1970	Controls methanol emissions from the blow heat recovery system.
PC4	EU9	Evaporator Area Nash Type Vacuum Pump Model: LR4-3 Installed: 1980's	Controls methanol emissions from a LVHC source in the evaporator area.
PC5	EU9	Evaporator Area Nash Type Vacuum Pump Model: LR4-3 Installed: 1980's	Controls methanol emissions from a LVHC source in the evaporator area.

All equipment, facilities and systems installed and used to achieve compliance with the terms and conditions of this Permit, shall at all times be maintained in good working order, and shall be operated as efficiently as possible so as to minimize air pollutant emissions and meet all applicable air pollution emissions limits. The controls listed shall be fully operational upon facility startup and shall not be bypassed during startup, operation, or shutdown of EU7, EU8, or EU9.

The pollution control equipment shall be maintained regularly, in accordance with the manufacturers recommended maintenance schedules and specifications. The Facility shall keep all maintenance records, on file for review upon request by DES and/or EPA.

VII. Alternative Operating Scenarios:

GPB has identified seven alternative operating scenarios listed below which enable it operational flexibility while ensuring that the modification identified in its Temporary Permit for the Combustion Turbines and supplemental HRSG Units and Boilers #4 & #5 does not trigger New Source Review (NSR) or Non-Attainment Area Review (NA) permitting requirements provided maximum allowable emissions limits are met:

1. Normal Operating Scenario (Interruptible Gas/Oil) – Both turbines firing No. 2 fuel oil at maximum capacity, 70.3 mmBtu/hr gross heat input each, for up to 75 days in a consecutive 365 day period and both turbines firing natural gas at maximum capacity, 65.2 mmBtu/hr gross heat input each, for up to 288 days in a consecutive 365 day period. Both duct burners would be firing natural gas only, at maximum capacity, 84.5 mmBtu/hr gross heat input each, for up to 363 days in a consecutive 365 day period.
2. Normal operating scenario (Gas only) – Both turbines firing natural gas only at maximum capacity, 65.2 mmBtu/hr gross heat input each, for up to 363 days in a consecutive 365 day period. Both duct burners would be firing natural gas only, at maximum capacity, 84.5 mmBtu/hr gross heat input each, for up to 363 days in a consecutive 365 day period.
3. Boiler Backup Scenario (Turbines and HRSG's Unavailable) – Boilers #4 & #5 firing No. 6 fuel oil with a maximum sulfur content of 0.5% by weight at maximum capacity, 107 mmBtu/hr gross heat input rate each for up to 102.5 days in a consecutive 365 day period and Boilers #4 & #5 firing natural gas at maximum capacity, 107 mmBtu/hr gross heat input rate each for up to 260.5 days in a consecutive 365 day period.
4. Boiler Backup Scenario (Oil Only) – Boilers #4 & #5 firing No. 6 fuel oil with a maximum sulfur content of 0.5% by weight at maximum capacity, 107 mmBtu/hr gross heat input rate each for up to 120 days in a consecutive 365 day period. (Both Turbines and HRSG Units down.)
5. Backup Scenario (One turbine and one HRSG Unit out of service) – Boiler #4 or Boiler #5 firing No. 6 fuel oil with a maximum sulfur content of 0.5% by weight at maximum capacity, 107 mmBtu/hr gross heat input rate for up to 112 days in a consecutive 365 day period and firing natural gas at maximum capacity, 107 mmBtu/hr gross heat input rate for up to 251 days in a consecutive 365 day period. One turbine firing No. 2 fuel oil at maximum capacity, 70.3 mmBtu/hr gross heat input rate for up to 112 days in a consecutive 365 day period and firing natural gas at maximum capacity, 65.2 mmBtu/hr gross heat input rate for up to 251 days in a consecutive 365 day period. One duct burner firing natural gas at maximum capacity, 84.5 mmBtu/hr gross heat input rate for up to 363 days in a consecutive 365-day period.
6. Maximized Fuel Use of Natural Gas Scenario – Both turbines firing natural gas at maximum capacity, 65.2 mmBtu/hr gross heat input rate for up to 363 days in a consecutive 365-day period. Both duct burners would be firing natural gas only, at maximum capacity, 84.5 mmBtu/hr gross heat input each, for up to 363 days in a consecutive 365-day period. Boilers #4 & #5 firing natural gas at maximum capacity, 107 mmBtu/hr each for up to 118 days in a consecutive 365 day period.
7. Maximum Natural Gas to Turbines/HRSG's and No. 6 Fuel Oil to Boilers Scenario – Boilers #4 & #5 firing No. 6 fuel oil with a maximum sulfur content of 0.5% by weight at maximum capacity, 107 mmBtu/hr gross heat input rate each for up to 20 days each in a consecutive 365 day period. Turbines firing natural gas at maximum capacity, 65.2 mmBtu/hr gross heat input rate each for up to 363 days in a consecutive 365-day period.

Both duct burners would be firing natural gas only, at maximum capacity, 84.5 mmBtu/hr gross heat input each, for up to 363 days in a consecutive 365-day period.

Note: Other operating scenarios are implicitly allowed, since their emissions are lower than those listed in 1. through 7. above, and not NSR or PSD limited. These scenarios include, but are not limited to:

- One or both HRSG's operating at maximum rates, with one or both Turbines shut down.

- One or both HRSG's operating at maximum firing rates with both turbines shut down.

- Other combinations of all six combustion devices operating at varying firing rates and operating days, provided that the annual steam and power plant emissions listed in Table 5B are not exceeded.

- Based on performance testing of the combustion turbines and heat recovery steam generating units, the days of operation while firing fuel oil or natural gas in the above alternate operating scenarios may be changed via a permit modification in accordance with Env-A 612, provided that the annual steam and power plant emissions in Table 5B are not exceeded.

VIII. Applicable Requirements:

A. State-only Enforceable Operational and Emission Limitations:

The Permittee shall be subject to the state-only operational and emission limitations identified in Table 4 below.

Table 4 – State-only Enforceable Operational and Emission Limitations

Item #	Applicable Requirements	Applicable Emission Unit	Regulatory Cite
1.	In accordance with Env-A 1403.01, new or modified devices or processes installed after May 8, 1998, shall be subject to the requirements of Env-A 1400	Facility Wide	Env-A 1403.01.
2.	In accordance with 1403.02(a), all existing unmodified devices or processes, which are in operation during the transition period ending three years from May 8, 1998 (May 8, 2001), shall comply with either Env-A 1300 or Env-A 1400.	Facility Wide	Env-A 1403.02(a)
3.	In accordance with Env-A 1403.02(b), all existing devices or processes in operation after the transition period ending three years from May 8, 1998 (May 8, 2001), shall comply with Env-A 1400. Env-A 1300 will no longer be in effect.	Facility Wide	Env-A 1403.02(b)
4.	In accordance with Env-A 1404.01(d), documentation for the demonstration of compliance shall be retained at the facility, and shall be made available to the DES for inspection.	Facility Wide	Env-A 1404.01(d)
5.	The owner of an existing device or process requiring a permit under chapter Env-A 1400, shall submit to the DES no later than one year prior to the end of the transition period (May 8, 2000), an application for modification to a title V permit in accordance with Env-A 609.18. A request to the DES to perform air dispersion modeling shall also be submitted at that time.	Facility Wide	Env-A 1405.02
6.	The owner of an existing device or process requiring a permit under Env-A 1300, shall submit to the DES no later than one year prior to the end of the transition period (May 8, 2000), a compliance plan identifying how the device or process will comply with chapter Env-A 1400 by the end of the transition period. The compliance plan shall contain the dates when the information required in Env-A 1405.02 will be filed with the DES.	Facility Wide	Env-A 1405.03
7.	In accordance with Env-A 1406.01, the owner of any device or process, which emits a regulated toxic pollutant, shall determine compliance with the ambient air limits by using one of the methods provided in Env-A 1406.02, Env-A 1406.03, or Env-A 1406.04. Upon request, the owner of any device or process, which emits a regulated toxic air pollutant, shall provide documentation of compliance with the ambient air limits to the DES.	Facility Wide	Env-A 1406.01
8.	Sulfur dioxide emissions from each Class B major source, shall have an average emission rate of 1.6 pounds sulfur dioxide per million Btu input, equivalent to No. 6 oil with 1.5 percent sulfur by weight.	Facility Wide	Env-A 404.01

Table 4 – State-only Enforceable Operational and Emission Limitations			
Item #	**Applicable Requirements**	**Applicable Emission Unit**	**Regulatory Cite**
9.	The Combustion Turbine/HRSG exhausts and Boilers #4 & #5 are allowed the following exceptions to the 20% opacity standard listed above: 1. The average opacity shall be allowed to be in excess of those standards specified in Env-A 2003.01 and Env-A 2003.02 for one period of 6 continuous minutes in any 60 minute period during startup, shutdown, malfunction, soot blowing, grate cleaning, and cleaning of fires. 2. Exceedances of the opacity standard shall not be considered violations of this part if the source demonstrates to the division that such exceedances were the result of the adherence to good boiler operating practices which, in the long term, results in the most efficient or safe operation of the boiler. 3. Examples of activities that may cause exceedances of the opacity standard that shall not be considered violations include the following: a) Continuous soot blowing of the entire boiler tube sections over regular time intervals as determined by the operator and in conformance with good boiler operating practice; and b) Cold startup of a boiler over a continuous period of time resulting in efficient heat-up and stabilization of its operation and the expeditious achievement of normal operation of the unit. 4. Exceedances of the opacity standard shall not be considered violations of this part if the source demonstrates to the division that such exceedances were the result of the occurrence of an unplanned incident in which the opacity exceedance was beyond the control of the operator and in response to such an incident, the operator took appropriate steps in conformance with good boiler operating practice to eliminate the excess opacity as quickly as possible.	EU1, EU2, EU3, EU4, EU5, & EU6	Env-A 2003.04(c), (d), (e), & (f) & Temporary Permit FP-T-0051 Amended
10.	Opacity of gaseous emissions from the recovery kiln shall not be in excess of 20 percent opacity for any continuous 6-minute period in any 60-minute period. GPB is allowed an exemption for periods of up to 20 minutes per shift when the DC power is “off” for water washing of the electrostatic precipitator to regain necessary DC voltage and for periods as long as 5 minutes each when unstable operation occurs from rings forming and breaking up in the kiln	EU7	Env-A 2003.02 & State Permit to Operate PO-BP-2240
11.	Particulate matter emissions from the discharge of the recovery kiln venturi scrubber/electrostatic precipitator shall be less than the following equation: $E = 4.10 \times P^{(0.67)}$ Where: E means the maximum particulate matter emission rate in lb/hr; and P means the black liquor solids firing rate of the recovery kiln in tons/hr. The wet venturi/electrostatic precipitator shall have a particulate matter removal efficiency of 90%.	EU7	Env-A 2103.02(c)

B. Federally Enforceable Operational and Emission Limitations

The Permittee shall be subject to the Federally enforceable operational and emission limitations identified in Tables 5A and 5B below:

Table 5A – Federally Enforceable Operational and Emission Limitations

Item #	Applicable Requirement	Applicable Emission Unit	Regulatory Cite
1.	Combustion Turbine #1 shall be limited to a maximum gross heat input rate of 73.0 mmBtu/hr while firing natural gas at 0 deg F or 70.4 mmBtu/hr while firing No. 2 fuel oil at 0 deg F. Maximum hourly fuel consumption shall be limited to 73,000 cubic feet per hour of natural gas assuming 1,000 Btu/scf or 495.8 gallons per hour of No. 2 fuel oil assuming 142,000 Btu/gal.	EU3	Temporary Permit FP-T-0051 Amended
2.	Combustion Turbine #2 shall be limited to a maximum gross heat input rate of 73.0 mmBtu/hr while firing natural gas at 0 deg F or 70.4 mmBtu/hr while firing No. 2 fuel oil at 0 deg F. Maximum hourly fuel consumption shall be limited to 73,000 cubic feet per hour of natural gas assuming 1,000 Btu/scf or 495.8 gallons per hour of No. 2 fuel oil assuming 142,000 Btu/gal.	EU4	Temporary Permit FP-T-0051 Amended
3.	Duct Burner #1 which serves HRSG Unit #1 shall be limited to a maximum gross heat input rate of 84.5 mmBtu/hr while firing natural gas when Combustion Turbine #1 is in operation. Maximum hourly fuel consumption shall be limited to 84,500 cubic feet per hour of natural gas assuming 1,000 Btu/scf for Duct Burner #1 when the Combustion Turbine #1 is in operation. Duct Burner #1 may be operated on fresh air makeup instead of the combustion off-gases coming from Combustion Turbine #1, while Combustion Turbine #1 is off-line. Duct Burner #1 is limited to 126.9 mmBtu/hr gross heat input rate while firing natural gas when Combustion Turbine #1 is off-line. Maximum hourly fuel consumption shall be limited to 126,900 cubic feet per hour of natural gas assuming 1,000 Btu/scf for Duct Burner #1 when Combustion Turbine #1 is off-line.	EU5	Temporary Permit FP-T-0051 Amended
4.	Duct Burner #2 which serves HRSG Unit #2 shall be limited to a maximum gross heat input rate of 84.5 mmBtu/hr while firing natural gas when Combustion Turbine #2 is in operation. Maximum hourly fuel consumption shall be limited to 84,500 cubic feet per hour of natural gas assuming 1,000 Btu/scf for Duct Burner #2 when the Combustion Turbine #2 is in operation. Duct Burner #2 may be operated on fresh air makeup instead of the combustion off-gases coming from Combustion Turbine #2, while Combustion Turbine #2 is off-line. Duct Burner #2 is limited to 126.9 mmBtu/hr gross heat input rate while firing natural gas when Combustion Turbine #2 is off-line. Maximum hourly fuel consumption shall be limited to 126,900 cubic feet per hour of natural gas assuming 1,000 Btu/scf for Duct Burner #2 when Combustion Turbine #2 is off-line.	EU6	Temporary Permit FP-T-0051 Amended
5.	Boiler #4 shall be limited to a maximum gross heat input rate of 107 mmBtu/hr while firing natural gas or No. 6 fuel oil. Maximum hourly fuel consumption shall be limited to 107,000 cubic feet per hour of natural gas assuming 1,000 Btu/scf or 713 gallons per hour of No. 6 fuel oil assuming 150,000 Btu/gal.	EU1	Temporary Permit FP-T-0051 Amended

Table 5A – Federally Enforceable Operational and Emission Limitations			
Item #	**Applicable Requirement**	**Applicable Emission Unit**	**Regulatory Cite**
6.	Boiler #5 shall be limited to a maximum gross heat input rate of 107 mmBtu/hr while firing natural gas or No. 6 fuel oil. Maximum hourly fuel consumption shall be limited to 107,000 cubic feet per hour of natural gas assuming 1,000 Btu/scf or 713 gallons per hour of No. 6 fuel oil assuming 150,000 Btu/gal.	EU2	Temporary Permit FP-T-0051 Amended
7.	GPB shall be limited to less than 3 consecutive hours per 24-hour period when both turbines are burning No. 2 fuel oil at the same time, while discharging through their bypass stacks. This limit applies only if Boilers 1, 4, and 5 are burning No. 6 fuel oil at maximum load during the same time period.	EU3 & EU4	RSA 125-C:6, RSA 125-C:11 & Env-A 606.04
8.	Days of operation of Combustion Turbines #1 & #2, HRSG Units #1 & #2, and Boilers #4 & #5 shall be limited to 363 days per consecutive 365-day period.	EU1, EU2, EU3, EU4, EU5, & EU6	RSA 125-C:6, RSA 125-C:11 & Env-A 606.04
9.	The sulfur content of No. 6 fuel oil shall not exceed 0.5 percent sulfur by weight.	Facility Wide	RSA 125-C:6, RSA 125-C:11 & Env-A 606.04 & Temporary Permit FP-T-0051 Amended
10.	The Facility shall comply with the National Ambient Air Quality Standards (NAAQS) and the applicable requirements of RSA 125-C:6, RSA C:11 and Env-A 606.04. These sections include, but are not limited to, descriptions of the powers and duties of the commissioner, and requirements for adherence to permit application procedures and air pollution dispersion modeling impact analyses.	Facility Wide	RSA 125-C:6, RSA 125-C:11 & Env-A 606.04
11.	The sulfur content of No. 2 oil and off road diesel fuel oil shall not exceed 0.40 percent sulfur by weight.	Facility Wide	Env-A 1604.01(a) & Temporary Permit FP-T-0051 Amended
12.	Gaseous fuel shall contain no more than 5 grains of sulfur per 100 cubic feet of gas, calculated as hydrogen sulfide at standard temperature and pressure.	Facility Wide	40 CFR 52[2]
13.	The opacity of emissions from the Combustion Turbine/HRSG exhausts and Boilers #4 & #5 shall not exceed 20% for any consecutive 6-minute period in any 60 minute period.	EU1, EU2, EU3, EU4, EU5, & EU6	Env-A 2003.02 & Temporary Permit FP-T-0051 Amended

[2] Env-A 402.03, effective December 27, 1990, was adopted as part of the State Implementation Plan (SIP) on September 14, 1992 and is still considered federally enforceable until such time as the SIP is amended and approved by EPA.

<table>
<tr><th colspan="4">Table 5A – Federally Enforceable Operational and Emission Limitations</th></tr>
<tr><th>Item #</th><th>Applicable Requirement</th><th>Applicable Emission Unit</th><th>Regulatory Cite</th></tr>
<tr><td>14.</td><td>In accordance with Env-A 2003.08, the maximum particulate matter emission rate for each of the Combustion Turbine/HRSG exhausts and Boilers #4 & #5 shall not be greater than 0.15 lb/mmBtu. In that the facility is opting out of NSR and NA applicability, it has accepted lower particulate matter emissions limits, which are presented below in Table 5B. Exceedances of these emissions limits constitute a permit violation.</td><td>EU1, EU2, EU3, EU4, EU5, & EU6</td><td>Temporary Permit FP-T-0051 Amended</td></tr>
<tr><td>15.</td><td>The emissions of criteria pollutants from the Combustion Turbines, Heat Recovery Steam Generating Units, and Boilers #4 & #5 shall not exceed the emissions limitations listed in Table 5B.</td><td>EU1, EU2, EU3, EU4, EU5, & EU6</td><td>Temporary Permit FP-T-0051 Amended</td></tr>
<tr><td>16.</td><td>The Combustion Turbine emissions shall be limited to less than the following NOx limits, whichever is more stringent of a. or b.:

a. STD = 0.0150 X (14.4/Y) + F (percent by volume at 15% oxygen, dry basis)
Where:
Y = manufacturer’s rated heat rate at peak load (kilojoules per watt hour), or actual measured heat rate based on lower heating value of fuel as measured at actual peak load for the facility. Y can not exceed 14.4 kilojoules per watt hour.
F = NOx emission allowance (percent by volume) from Table 3 below:

<table><tr><th colspan="2">Table 3 – F Factors</th></tr><tr><td>Fuel Bound Nitrogen (% by weight)</td><td>F (NOx, % by volume)</td></tr><tr><td>N less than or equal to 0.015</td><td>0</td></tr><tr><td>0.015 < N less than or equal to 0.1</td><td>0.04(N)</td></tr><tr><td>0.1 < N less than or equal to 0.25</td><td>0.004 + 0.0067(N – 0.1)</td></tr><tr><td>N > 0.25</td><td>0.005</td></tr></table>
and/or
b. 42 ppmdv, corrected to 15% oxygen when firing natural gas or 65 ppmdv corrected to 15% oxygen when firing No. 2 fuel oil (NOx RACT Requirements from Env-A 1211.06(c)(1)b.).</td><td>EU3 & EU4</td><td>40 CFR 60 Subpart GG Section 60.332</td></tr>
</table>

Table 5A – Federally Enforceable Operational and Emission Limitations			
Item #	**Applicable Requirement**	**Applicable Emission Unit**	**Regulatory Cite**
17.	For purposes of NOx RACT, the Combustion Turbines #1 & #2 shall meet the more stringent of Env-A 1211.06(c)(1)b. [42 ppmdv, corrected to 15% oxygen when operating on gas; 65 ppmdv, corrected to 15% oxygen when operating on No. 2 fuel oil] or 40 CFR 60 Subpart GG Section 60.332(a)(2), when operating on gas. Note that NOx emission limits while firing gas are 25 ppmdv in Table 5B, which are based on vendor guarantees of 25 ppmdv, which are well below the NOx RACT limit of 42 ppmdv while firing natural gas. The facility may use discrete emissions reductions credits generated while burning natural gas to bring it in compliance with the 65 ppmdv NOx RACT limit for while firing fuel oil if necessary.	EU3 & EU4	Env-A 1211.06(c)(1)b., & 40 CFR 60 Subpart GG Section 60.332(a)(2)
18.	The Combustion Turbine emissions shall be limited to less than 0.015 percent sulfur dioxide by volume at 15 percent oxygen and on a dry basis while firing natural gas.	EU3 & EU4	40 CFR 60 Subpart GG Section 60.333
19.	NOx emissions from the HRSG Units #1 & #2 shall be less than 0.10 lb/mmBtu, based on an hourly average or the duct burners on HRSG Units #1 & #2 must be DES certified Low NOx Burners, as stated in Env-A 1211.05(c)(3)a.1. and 2. GPB shall determine compliance with these NOx RACT emissions limitations by conducting stack testing for NOx once every three years after the initial performance test required for each of the HRSG Units following the test methods contained in Env-A 1211.21. GPB may use Discrete Emissions Reductions Credits in accordance with Env-A 3100 for purposes of compliance with NOx RACT requirements for the HRSG Units #1 and #2 for when they are fresh air firing without their corresponding Combustion Turbine in operation.	EU5 & EU6	Env-A 1211.05(c)(3)a.1**.,2**.
20.	For the purposes of NOx RACT, NOx emissions from Boilers #4 & #5 shall be controlled via use of DES approved Low NOx Burners and meet the emissions limitations contained in Table 5B. GPB shall determine compliance with these NOx RACT emissions limitations by conducting stack testing for NOx once every three years after the initial performance test required for each of the Boilers following the test methods contained in Env-A 1211.21.	EU1 & EU2	Env-A 1211.05(d)(3)a.2. Temporary Permit FP-T-0051 Amended
21.	GPB shall be responsible to purchase and acquire sufficient NOx discrete emissions reductions (DER) credits prior to starting up the two Combustion Turbines and two Heat Recovery Steam Generating Units, such that the facility maintains a positive balance of NOx DERs on hand at all times. (This is being done in case the turbines are started up during the winter months on No. 2 fuel oil and for fresh air firing of the heat recovery steam generating units during the startup and shakedown period.) In addition, these NOx discrete emission reduction credits may be used for the recovery kiln while front-end firing to meet the 0.85 lb NOx per ton black liquor solids fired emission limit in NOx RACT Order ARD-95-001.	EU3, EU4, EU5, EU6, & EU7	Temporary Permit FP-T-0051 Amended
22.	The maximum liquor feed rate of the recovery kiln shall be limited to 5800 pounds of spent liquor solids per hour, which is equivalent to 990 gallons per hour of strong spent liquor having a density of 10.65 lb/gal and a maximum of 55% solids.	EU7	State Permit to Operate PO-BP-2240

Table 5A – Federally Enforceable Operational and Emission Limitations			
Item #	**Applicable Requirement**	**Applicable Emission Unit**	**Regulatory Cite**
23.	The maximum oil firing rate of the recovery kiln shall be limited to 12.8 mmBtu/hr gross heat input rate, which is equivalent to 91.4 gallons per hour of No. 2 fuel oil at a maximum of 0.4% sulfur by weight, or which is equivalent to 85.3 gallons per hour of No. 6 fuel oil at a maximum of 2.2% sulfur by weight.	EU7	State Permit to Operate PO-BP-2240
24.	The maximum oil firing rate of the recovery kiln shall be limited to 307.2 mmBtu/day gross heat input of No. 2 fuel oil at a maximum of 0.4% sulfur by weight, which is equivalent to 2194 gallons per day of No. 2 fuel oil.	EU7	State Permit to Operate PO-BP-2240
25.	The maximum oil firing rate of the recovery kiln shall be limited to 58.9 mmBtu/day gross heat input of No. 6 fuel oil at a maximum of 2.2% sulfur by weight, which is equivalent to 393 gallons per day of No. 6 fuel oil.	EU7	State Permit to Operate PO-BP-2240
26.	The emissions of nitrogen oxides from the recovery kiln shall be limited to 0.85 lbs NOx/ton of black liquor solids fired during any 24-hour period.	EU7	NOx RACT Order ARD-95-001
27.	The emissions of nitrogen oxides from the recovery kiln shall be limited to 34 lbs/1000 gallons of No. 2 fuel oil during any 24-hour calendar day period.	EU7	NOx RACT Order ARD-95-001
28.	GPB shall operate the Peabody Wet Venturi Scrubber for the recovery kiln with a minimum of 200 gpm water or liquid recycle rate. This operating parameter range may be modified via a permit amendment in accordance with Env-A 612.04 based on compliance tests conducted for particulate matter in conjunction with NOx testing conducted on the Recovery Kiln.	EU7	State Permit to Operate PO-BP-2240
29.	GPB shall operate the Peabody Wet Electrostatic Precipitator for the recovery kiln at a minimum of 100 gpm shower wash flow and voltage range greater than 30 kilovolts DC. These operating parameter ranges may be modified via a permit amendment in accordance with Env-A 612.04 based on compliance tests conducted for particulate matter in conjunction with NOx testing conducted on the Recovery Kiln.	EU7	State Permit to Operate PO-BP-2240
30.	The owner or operator of each existing or new semichemical combustion unit must ensure that: a) The concentration of gaseous organic HAP, as measured by total hydrocarbons reported as carbon, discharged to the atmosphere is less than or equal to 2.97 lb/ton of black liquor solids fired; OR b) The gaseous organic HAP emissions, as measured by total hydrocarbons reported as carbon, are reduced by at least 90 percent prior to discharge of the gases to the atmosphere.	EU7	40 CFR 63 Subpart MM Section 63.862(c)(2)
31.	General Provisions of 40 CFR 63 Subpart A that apply to the recovery kiln at the GPB facility are covered in Table 1 of Subpart MM and incorporated by reference.	EU7	40 CFR 63 Subpart MM Section 63.860(c)
32.	GPB must comply with 40 CFR 63 Subpart MM by March 13, 2004.	EU7	40 CFR 63 Subpart MM Section 63.863(a)

Table 5A – Federally Enforceable Operational and Emission Limitations			
Item #	**Applicable Requirement**	**Applicable Emission Unit**	**Regulatory Cite**
33.	GPB shall collect and transport the gaseous emissions from the Blow Tank to the Direct Contact Condenser and from the Direct Contact Condenser to the blow heat recovery system Nash type vacuum pump and the gaseous emissions from the two evaporator vents to their respective Nash type vacuum pumps in a closed-vent collection system meeting all control requirements specified in Section 63.450.	EU8 & EU9	40 CFR 63 Subpart S Section 63.443(c)
34.	GPB shall achieve methanol emissions reductions equal to or greater than 98 percent, on a pound per oven dry ton basis, of the emissions from the digester blow tank direct contact condenser vent before the vacuum pump and evaporator vacuum pumps. GPB shall use their existing three vacuum pumps and treat the condensates generated by those pumps to partially control the digester and evaporator vents. In addition, GPB shall reroute all of the digester blow tank direct contact condenser condensate (an additional source not regulated by the subject NESHAP) from use in open processes to controlling them in the wastewater treatment plant.	EU8 & EU9	Equivalency By Permit 40 CFR 63 Section 63.94
35.	GPB must comply with the requirements of subpart A – General Provisions of this part, as indicated in Table 1 to this subpart (Subpart S).	EU8 & EU9	40 CFR 63 Subpart S Section 63.440(g)
36.	Periods of excess emissions reported under Section 63.455 for EU8 & EU9 (all emission sources subject to the equivalent emission limitation in Section 63.453(d)) shall not be a violation of Section 63.443(c) and (d) provided that the time of excess emissions (excluding periods of startup, shutdown, or malfunction) divided by the total process operating time in a semi-annual reporting period does not exceed one percent for control devices used to reduce the total HAP emissions from the LVHC system. Please note that process operating time for EU8 is for the digester and for EU9 is the evaporators.	EU8 & EU9	40 CFR 63 Subpart S Section 63.443(e)(1)

Table 5A – Federally Enforceable Operational and Emission Limitations			
Item #	**Applicable Requirement**	**Applicable Emission Unit**	**Regulatory Cite**
37.	Blow Tank gaseous emissions shall be collected in a closed-vent system operating under vacuum and conveyed to the direct contact condenser for application of a water shower which shall displace methanol in the gaseous phase into the condensate leaving the condenser for further treatment (biodegradation) at the effluent treatment plant. Gaseous emissions from the direct contact condenser shall be transported to the blow heat recovery system Nash type vacuum pump in a closed-vent system under vacuum where seal water to the vacuum pump and the centrifugal action of the vacuum pump shall further displace methanol into the liquid discharge leaving the vacuum pump, which shall be collected and transported to the effluent treatment plant for biodegradation of methanol. Each of the two LVHC sources in the evaporator area, i.e. gaseous emissions from evaporator vents to Nash type vacuum pumps shall be conveyed in a closed-vent system operated under vacuum to the respective Nash type vacuum pump. The bypass line from the blow tank to the direct contact condenser that goes to atmosphere shall be equipped with a vacuum monitoring system composed of a vacuum sensor/monitor and vent open monitor with a continuous recorder with alarm on the header from the blow tank to the entrance of the direct contact condenser to ensure that the blow tank vapors are always drawn into the direct contact condenser and Nash type vacuum pump following it. At any time this vent valve opens, the digester is shut down until corrective action is taken on the digester and blow tank recovery system. This shall ensure all HAPs are collected by the condenser and Nash type vacuum pump. Similarly, the five body evaporator set has vacuum/pressure gauges located on each evaporator body showing vacuum pulled. As long as there is vacuum on these evaporator bodies, it ensures that non-condensibles and residual methanol is being pulled out to the Nash type vacuum pumps.	EU8 & EU9	40 CFR 63 Subpart S Section 63.450
38.	Each owner or operator of a control device subject to the monitoring provisions of this section shall operate the control device in a manner consistent with the minimum or maximum (as appropriate) operating parameter value or procedure required to be monitored under paragraph (m) of Section 63.453 and established under this subpart. Except as provided in paragraph of Section 63.453, Section 63.443(e), or Section 63.446(g), operation of the control device below minimum operating parameter values or above maximum operating parameter values established under this subpart or failure to perform procedures required by this subpart shall constitute a violation of the applicable emission standard of this subpart and be reported as a period of excess emissions.	EU8 & EU9	40 CFR 63 Subpart S Section 63.453(o)
39.	GPB shall ensure that the wastewater treatment plant is operated in a manner consistent with the minimum or maximum (as appropriate) operating parameter value or procedure required to be monitored under paragraph (m) of Section 63.453, and established under Subpart S. Except as provided in paragraph (p) of Section 63.453, Section 63.443(e), or Section 63.446(g), operation of the control device below minimum operating parameter values or above maximum operating parameter values established under this subpart or failure to perform procedures required by this subpart shall constitute a violation of the applicable emission standard of this subpart and be reported as a period of excess emissions.	Wastewater Treatment Plant	40 CFR 63 Subpart S Section 63.453(o)

Table 5A – Federally Enforceable Operational and Emission Limitations			
Item #	**Applicable Requirement**	**Applicable Emission Unit**	**Regulatory Cite**
40.	GPB shall operate and maintain the temperature and flow of the cooling water to the direct contact condenser in a manner consistent with the minimum or maximum (as appropriate) operating parameter value or procedure required to be monitored under paragraph (m) of Section 63.453, and established under Subpart S. Except as provided in paragraph (p) of Section 63.453, Section 63.443(e), or Section 63.446(g), operation of the control device below minimum operating parameter values or above maximum operating parameter values established under this subpart or failure to perform procedures required by this subpart shall constitute a violation of the applicable emission standard of this subpart and be reported as a period of excess emissions.	EU8	40 CFR 63 Subpart S Section 63.453(o)
41.	GPB shall operate and maintain the flow of condensates from the PL-13 condensate collection tank to the GPB effluent sump pit in a manner consistent with the minimum or maximum (as appropriate) operating parameter value or procedure required to be monitored under paragraph (m) of Section 63.453, and established under Subpart S. Except as provided in paragraph (p) of Section 63.453, Section 63.443(e), or Section 63.446(g), operation of the control device below minimum operating parameter values or above maximum operating parameter values established under this subpart or failure to perform procedures required by this subpart shall constitute a violation of the applicable emission standard of this subpart and be reported as a period of excess emissions.	EU8 & EU9	40 CFR 63 Subpart S Section 63.453(o)
42.	GPB shall operate and maintain the vacuum on the direct contact condenser and evaporator effects in a manner consistent with the minimum or maximum (as appropriate) operating parameter value or procedure required to be monitored under paragraph (m) of Section 63.453, and established under Subpart S. Except as provided in paragraph (p) of Section 63.453, Section 63.443(e), or Section 63.446(g), operation of the control device below minimum operating parameter values or above maximum operating parameter values established under this subpart or failure to perform procedures required by this subpart shall constitute a violation of the applicable emission standard of this subpart and be reported as a period of excess emissions.	EU8 & EU9	40 CFR 63 Subpart S Section 63.453(o)
43.	GPB shall operate and maintain the vacuum on the header from the blow tank to the entrance of the direct contact condenser in a manner consistent with the minimum or maximum (as appropriate) operating parameter value or procedure required to be monitored under paragraph (m) of Section 63.453, and established under Subpart S. Except as provided in paragraph (p) of Section 63.453, Section 63.443(e), or Section 63.446(g), operation of the control device below minimum operating parameter values or above maximum operating parameter values established under this subpart or failure to perform procedures required by this subpart shall constitute a violation of the applicable emission standard of this subpart and be reported as a period of excess emissions.	EU8	40 CFR 63 Subpart S Section 63.453(o)
44.	GPB shall install a gasketed cover to prevent HAP emissions to the atmosphere on the top of the PL13 tank and the effluent sump. The PL13 tank shall be equipped with a submerged overflow pipe.	EU8 & EU9	Equivalency By Permit 40 CFR 63 Section 63.94

Table 5A – Federally Enforceable Operational and Emission Limitations			
Item #	**Applicable Requirement**	**Applicable Emission Unit**	**Regulatory Cite**
45.	Operation and maintenance requirements. (1)(i) At all times, including periods of startup, shutdown, and malfunction, owners or operators shall operate and maintain any affected source, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by all relevant standards. (ii) Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the startup, shutdown, and malfunction plan required in paragraph (e)(3) of this section. (iii) Operation and maintenance requirements established pursuant to section 112 of the Act are enforceable independent of emissions limitations or other requirements in relevant standards. (2) Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures (including the startup, shutdown, and malfunction plan required in paragraph (e)(3) of this section), review of operation and maintenance records, and inspection of the source.	EU7, EU8, & EU9	40 CFR 63 Subpart A Section 63.6(e)

Table 5A – Federally Enforceable Operational and Emission Limitations			
Item #	**Applicable Requirement**	**Applicable Emission Unit**	**Regulatory Cite**
45.	Operation and maintenance requirements (continued): (3) Startup, shutdown, and malfunction plan. (i) The owner or operator of an affected source shall develop and implement a written startup, shutdown, and malfunction plan that describes, in detail, procedures for operating and maintaining the source during periods of startup, shutdown, and malfunction and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the relevant standard. As required under §63.8(c)(1)(i), the plan shall identify all routine or otherwise predictable CMS malfunctions. This plan shall be developed by the owner or operator, by the source's compliance date for that relevant standard. The plan shall be incorporated by reference into the source's title V permit. The purpose of the startup, shutdown, and malfunction plan is to- (A) Ensure that, at all times, owners or operators operate and maintain affected sources, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by all relevant standards; (B) Ensure that owners or operators are prepared to correct malfunctions as soon as practicable after their occurrence in order to minimize excess emissions of hazardous air pollutants; and (C) Reduce the reporting burden associated with periods of startup, shutdown, and malfunction (including corrective action taken to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation). (ii) During periods of startup, shutdown, and malfunction, the owner or operator of an affected source shall operate and maintain such source (including associated air pollution control equipment) in accordance with the procedures specified in the startup, shutdown, and malfunction plan developed 28under paragraph (e)(3)(i) of this section. (iii) When actions taken by the owner or operator during a startup, shutdown, or malfunction (including actions taken to correct a malfunction) are consistent with the procedures specified in the affected source's startup, shutdown, and malfunction plan, the owner or operator shall keep records for that event that demonstrate that the procedures specified in the plan were followed. These records may take the form of a ``checklist,'' or other effective form of record keeping, that confirms conformance with the startup, shutdown, and malfunction plan for that event. In addition, the owner or operator shall keep records of these events as specified in §63.10(b) (and elsewhere in this part), including records of the occurrence and duration of each startup, shutdown, or malfunction of operation and each malfunction of the air pollution control equipment. Furthermore, the owner or operator shall confirm that actions taken during the relevant reporting period during periods of startup, shutdown, and malfunction were consistent with the affected source's startup, shutdown and malfunction plan in the semiannual (or more frequent) startup, shutdown, and malfunction report required in §63.10(d)(5).	EU7, EU8, & EU9	40 CFR 63 Subpart A Section 63.6(e)

Table 5A – Federally Enforceable Operational and Emission Limitations			
Item #	**Applicable Requirement**	**Applicable Emission Unit**	**Regulatory Cite**
45.	Operation and maintenance requirements (continued): (iv) If an action taken by the owner or operator during a startup, shutdown, or malfunction (including an action taken to correct a malfunction) is not consistent with the procedures specified in the affected source's startup, shutdown, and malfunction plan, the owner or operator shall record the actions taken for that event and shall report such actions within 2 working days after commencing actions inconsistent with the plan, followed by a letter within 7 working days after the end of the event, in accordance with §63.10(d)(5) (unless the owner or operator makes alternative reporting arrangements, in advance, with the Administrator (see §63.10(d)(5)(ii))). (v) The owner or operator shall keep the written startup, shutdown, and malfunction plan on record after it is developed to be made available for inspection, upon request, by the Administrator for the life of the affected source or until the affected source is no longer subject to the provisions of this part. In addition, if the startup, shutdown, and malfunction plan is revised, the owner or operator shall keep previous (i.e., superseded) versions of the startup, shutdown, and malfunction plan on record, to be made available for inspection, upon request, by the Administrator, for a period of 5 years after each revision to the plan. (vi) To satisfy the requirements of this section to develop a startup, shutdown, and malfunction plan, the owner or operator may use the affected source's standard operating procedures (SOP) manual, or an Occupational Safety and Health Administration (OSHA) or other plan, provided the alternative plans meet all the requirements of this section and are made available for inspection when requested by the Administrator. (vii) Based on the results of a determination made under paragraph (e)(2) of this section, the Administrator may require that an owner or operator of an affected source make changes to the startup, shutdown, and malfunction plan for that source. The Administrator may require reasonable revisions to a startup, shutdown, and malfunction plan, if the Administrator finds that the plan: (A) Does not address a startup, shutdown, or malfunction event that has occurred; (B) Fails to provide for the operation of the source (including associated air pollution control equipment) during a startup, shutdown, or malfunction event in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by all relevant standards; or (C) Does not provide adequate procedures for correcting malfunctioning process and/or air pollution control equipment as quickly as practicable. (viii) If the startup, shutdown, and malfunction plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction but was not included in the startup, shutdown, and malfunction plan at the time the owner or operator developed the plan, the owner or operator shall revise the startup, shutdown, and malfunction plan within 45 days after the event to include detailed procedures for operating and maintaining the source during similar malfunction events and a program of corrective action for similar malfunctions of process or air pollution control equipment.	EU7, EU8, & EU9	40 CFR 63 Subpart A Section 63.6(e)

Table 5A – Federally Enforceable Operational and Emission Limitations			
Item #	**Applicable Requirement**	**Applicable Emission Unit**	**Regulatory Cite**
46.	Accidental Release Program Requirements. Storage of regulated chemicals at the facility, are less than the applicable threshold quantities established in 40 CFR 68.130. Administrative controls will be established in order to ensure that inventories of regulated substances are maintained below the specified threshold quantities. The facility is subject to the Purpose and General Duty clause of the 1990 Clean Air Act, Section 112(r)(1). General Duty includes the following responsibilities: a) Identify potential hazards which result from such releases using appropriate hazard assessment techniques; b) Design and maintain a safe facility; c) Take steps necessary to prevent releases; and d) Minimize the consequences of accidental releases, which do occur. If, in the future, the facility wishes to store quantities of high risk regulated substances above the threshold levels, an emergency response plan shall be submitted to the DES prior to exceeding threshold quantity limits. This plan shall include the information listed in 40 CFR 68, Subpart E.	Facility Wide	40 CFR 68 Federally Enforceable

Table 5B – Criteria Pollutant Emissions Limitations for Combustion Turbines, HRSG's, & Boilers #4 & #5					
Device	Oxides of Nitrogen (NOx)	Sulfur Dioxide (SO2)	Carbon Monoxide (CO)	Particulate Matter (PM10)	Non-Exempt Volatile Organic Compounds (NEVOC)
Comb. Turb. #1	25 ppmdv (gas) at 15% O2 65 ppmdv (oil) at 15% O2	0.0136 lb/mmBtu (gas) 0.406 lb/mmBtu (oil)	0.111 lb/mmBtu (gas) 0.114 lb/mmBtu (oil)	0.042 lb/mmBtu (gas) 0.061 lb/mmBtu (oil)	0.01 lb/mmBtu (gas) 0.033 lb/mmBtu (oil)
HRSG #1	0.10 lb/mmBtu (gas)	0.0136 lb/mmBtu (gas)	0.080 lb/mmBtu (gas)	0.020 lb/mmBtu (gas)	0.020 lb/mmBtu (gas)
HRSG #1 Fresh Air Firing	0.10 lb/mmBtu 12.69 lb/hr (gas)	0.0136 lb/mmBtu 1.70 lb/hr (gas)	0.080 lb/mmBtu 10.15 lb/hr (gas)	0.010 lb/mmBtu 1.27 lb/hr (gas)	0.025 lb/mmBtu 3.17 lb/hr (gas)
CT#1(oil) & HRSG#1 (gas) Combined	0.170 lb/mmBtu 26.26 lb/hr	0.192 lb/mmBtu 29.65 lb/hr	0.095 lb/mmBtu 14.77 lb/hr	0.039 lb/mmBtu 5.98 lb/hr	0.026 lb/mmBtu 4.01 lb/hr
CT#1(gas) & HRSG#1 (gas) Combined	0.097 lb/mmBtu 14.45 lb/hr	0.014 lb/mmBtu 2.04 lb/hr	0.094 lb/mmBtu 14.00 lb/hr	0.030 lb/mmBtu 4.43 lb/hr	0.016 lb/mmBtu 2.34 lb/hr
Comb. Turb. #2	25 ppmdv (gas) at 15% O2 65 ppmdv (oil) at 15% O2	0.0136 lb/mmBtu (gas) 0.406 lb/mmBtu (oil)	0.111 lb/mmBtu (gas) 0.114 lb/mmBtu (oil)	0.042 lb/mmBtu (gas) 0.061 lb/mmBtu (oil)	0.01 lb/mmBtu (gas) 0.033 lb/mmBtu (oil)
HRSG #2	0.100 lb/mmBtu (gas)	0.0136 lb/mmBtu (gas)	0.080 lb/mmBtu (gas)	0.020 lb/mmBtu (gas)	0.020 lb/mmBtu (gas)
HRSG #2 Fresh Air Firing	0.10 lb/mmBtu 12.69 lb/hr (gas)	0.0136 lb/mmBtu 1.70 lb/hr (gas)	0.080 lb/mmBtu 10.15 lb/hr (gas)	0.010 lb/mmBtu 1.27 lb/hr (gas)	0.025 lb/mmBtu 3.17 lb/hr (gas)
CT#2 (oil) & HRSG#2 (gas) Combined	0.170 lb/mmBtu 26.26 lb/hr	0.192 lb/mmBtu 29.65 lb/hr	0.095 lb/mmBtu 14.77 lb/hr	0.039 lb/mmBtu 5.98 lb/hr	0.026 lb/mmBtu 4.01 lb/hr
CT#2(gas) & HRSG#2 (gas) Combined	0.097 lb/mmBtu 14.45 lb/hr	0.014 lb/mmBtu 2.04 lb/hr	0.094 lb/mmBtu 14.00 lb/hr	0.030 lb/mmBtu 4.43 lb/hr	0.016 lb/mmBtu 2.34 lb/hr
Boiler #4	0.100 lb/mmBtu (gas) 0.390 lb/mmBtu (oil)	0.0136 lb/mmBtu (gas) 0.523 lb/mmBtu (oil)	0.200 lb/mmBtu (gas & oil)	0.010 lb/mmBtu (gas) 0.150 lb/mmBtu (oil)	0.010 lb/mmBtu (gas & oil)
Boiler #5	0.100 lb/mmBtu (gas) 0.390 lb/mmBtu (oil)	0.0136 lb/mmBtu (gas) 0.523 lb/mmBtu (oil)	0.200 lb/mmBtu (gas & oil)	0.010 lb/mmBtu (gas) 0.150 lb/mmBtu (oil)	0.010 lb/mmBtu (gas & oil)
Total Steam Plant Cap	218.07 tons per consecutive 12 month period	489.0 tons per consecutive 12 month period	241.76 tons per consecutive 12 month period	46.29 tons per consecutive 12 month period	23.46 tons per consecutive 12 month period

Table 5B Notes:

CO, PM10, and NEVOC emissions limits in lb/mmBtu for the duct burners in the HRSG Units are based on vendor guarantees using higher heating values. SO2 emissions limits in lb/mmBtu for the duct burners in the HRSG Units are based on the State limit of 5 grains sulfur per 100 cubic feet of natural gas and 0.4% sulfur in No. 2 fuel oil. NOx emission limits in lb/mmBtu for the duct burners in the HRSG Units are based on the NOx RACT limit of 0.10 lb/mmBtu.

Emissions limits in lb/mmBtu are based on the higher value of the two potential Combustion Turbine models (GE PGT-5B/1 or Solar Taurus 60S) vendor guarantees, which are based on higher heating value. SO2 emission limits in lb/mmBtu for the Combustion Turbines while firing gas or oil are based on the State limit of 5 grains of sulfur per 100 cubic feet of natural gas and 0.4% sulfur in No. 2 fuel oil. The NOx emission limits for the Turbines while firing gas are based on vendor guarantees of 25 ppmdv, which are well below the NOx RACT limit of 42 ppmdv. The facility may use discrete emissions reductions credits generated while burning natural gas to bring it in compliance with the 65 ppmdv NOx RACT limit for while firing fuel oil. See Item 22. in Table 5A and Items 2., 3., and 4. in Table 10 for all requirements concerning use of discrete emissions reductions credits. CO and VOC emission limits while firing gas were Solar guarantees, while PM10 limits were selected from GE guarantees. CO, PM10, and NEVOC limits for Turbines firing fuel oil were from Solar guarantees.

Combined Combustion Turbine/HRSG Unit emission limits in lb/hr were derived from multiplying the maximum heat input rate (mmBtu/hr) by the emission factor (lb/mmBtu) for the Combustion Turbine and HRSG Unit duct burner separately and summing up the result. Combined Combustion Turbine/HRSG Unit emission limits in lb/mmBtu are from taking the lb/hr emissions limit and dividing by the combined maximum heat input rate of the Combustion Turbine plus the HRSG Unit duct burner. The combined NOx lb/mmBtu emissions limits for the Combustion Turbine firing oil with the HRSG Unit firing natural gas is based on using a NOx emissions limit of 65 ppm while firing oil in the Turbine and 0.100 lb/mmBtu while firing natural gas in the HRSG Unit to reflect vendor guarantees while burning oil in the Combustion Turbine and for establishing limits while conducting the performance testing of the two units in operation together.

C. Emission Reductions Trading Requirements

The Permittee did not request emissions reductions trading in its operating permit application. At this point, DES has not included any permit terms authorizing emissions trading in this permit. All emission reduction trading, must be authorized under the applicable requirements of either Env-A 3000 (the “Emissions Reductions Credits [Arcs] Trading Program”), or Env-A 3000 (the “Discrete Emissions Reductions [DERs] Trading Program) and 42 U.S.C § 7401 et seq. (The “Act”), and must be provided for in this permit.

D. Monitoring and Testing Requirements:

The Permittee is subject to the monitoring and testing requirements as contained in Table 6 below:

Table 6 – Monitoring/Testing Requirements

Item #	Parameter	Method of Compliance	Frequency of Method	Device	Regulatory Cite
1.	Allows for adequate dispersion of HAPs and other regulated pollutants	The Permittee shall conduct annual visual inspections of each stack and fuel-burning device. Annual inspections shall include a thorough inspection of the condition of each stack exterior and each fuel burning device, and be focused on identifying holes, leaks, deposits, deficiencies, or deterioration of equipment and stacks. Every five (5) years, the Permittee shall inspect the interior of each stack for evidence of corrosion, cracks, or holes. Records of inspections, and subsequent maintenance, conducted as a result of the annual inspections, shall be kept on file at the facility and will be made available for review by DES and/or EPA upon request. Stacks to be inspected are EU1 through EU7.	Annually	Facility stacks and fuel burning devices	Env-A 806.01(4) & 40 CFR 70.6(a)(3) Federally Enforceable
2.	Sulfur content of No. 6 fuel oil	The operator shall conduct testing in accordance with appropriate ASTM test methods or retain delivery tickets which certify the weight percent of sulfur for each delivery of No. 6 fuel oil to determine compliance with the sulfur content limitation provisions specified in this permit for liquid fuels in order to meet the reporting requirements specified in Env-A 900.	For each delivery of fuel oil to the facility	Facility Wide	Env-A 809.01 Federally Enforceable
3.	Particulate Matter	The pollution control equipment (wet venturi scrubber and wet electrostatic precipitator) shall be maintained regularly, and in accordance with the manufacturers recommended maintenance schedules and specifications. The Facility shall keep all maintenance and repair records, on file for review upon request by DES and/or EPA. GPB shall monitor and record hourly the voltage across the wet electrostatic precipitator serving the recovery kiln. GPB shall continuously monitor the scrubber liquor flow to the wet venturi scrubber and the shower wash flow to the wet electrostatic precipitator. The wet venturi scrubber and electrostatic precipitator shall not be bypassed at any time during operation of the recovery kiln.	Continuous basis	EU7	40 CFR 70.6(a)(3) & Env-A 806.01 Federally Enforceable

Table 6 – Monitoring/Testing Requirements					
Item #	**Parameter**	**Method of Compliance**	**Frequency of Method**	**Device**	**Regulatory Cite**
4.	Periodic Monitoring (Fuel consumption and hours of operation by the Boilers, Comb. Turbines, and Duct Burners (HRSG's))	GPB shall install and operate the following monitoring devices: Natural gas and No. 2 fuel oil flow meters and totalizers shall be installed and continuously operated on the natural gas and No. 2 fuel oil inlet lines to each of the Combustion Turbines to measure the hourly and daily total natural gas and No. 2 fuel oil consumption for each of the Combustion Turbines. Natural gas and No. 6 fuel oil flow meters and totalizers shall be installed and continuously operated on the natural gas and No. 6 fuel oil inlet lines to each of the Boilers to measure the hourly and daily total consumption of natural gas and No. 6 fuel oil for each of the Boilers. In addition, natural gas flow meters and totalizers shall be installed and continuously operated on the natural gas inlet lines to each of the duct burners on each of the HRSG Units to measure the hourly and daily total consumption of natural gas in each of the HRSG Units. GPB shall calibrate these devices in accordance with the manufacturer's and or supplier's recommendations. GPB shall record the daily natural gas and No. 2 fuel oil usage for each of the Combustion Turbines in MMCF or gal/day, daily natural gas usage for each of the duct burners in MMCF, and daily natural gas and No. 6 fuel oil usage for each of the Boilers in MMCF/day and gal/day. GPB shall also monitor hours of operation each day for each of these fuel burning devices.	Daily	EU1, EU2, EU3, EU4, EU5, & EU6	Temporary Permit FP-T-0051 & 40 CFR 70.6 (a)(3)(i)(B) & Env-A 806 Federally Enforceable

Table 6 – Monitoring/Testing Requirements					
Item #	**Parameter**	**Method of Compliance**	**Frequency of Method**	**Device**	**Regulatory Cite**
5.	Natural Gas Sulfur and Nitrogen Content Verification (Custom fuel schedule for Subpart GG)	GPB must conduct monitoring of nitrogen and sulfur content of pipeline natural gas in accordance with Section 60.334(b)(2) of 40 CFR 60, Subpart GG. DES has been given delegation for approval of custom fuel monitoring via a letter dated July 16, 2001 from Ken Moraff, Co-Manager of Enforcement, Office of Environmental Stewardship – EPA Region 1. Being consistent with this letter, GPB shall be required to do the following monitoring of natural gas for consumption by the Combustion Turbine and HRSG Unit: 1. No monitoring of fuel nitrogen is required so long as GPB is supplied with solely pipeline-quality natural gas or LNG. 2. Sulfur monitoring shall be conducted using the following ASTM reference methods: D1072-80, D3031-81, D3246-81, D4084-82, 5504-94, or other EPA-approved method, on the following schedule: a) Once per quarter (starting with the calendar quarter in which the initial performance test is conducted) for 6 quarters, with no two monitoring dates within 30 days of each other. b) If the average sulfur content from the first 6 sulfur in fuel content test results is less than 50% of the sulfur limit (as expressed in 40 CFR 60 Subpart GG), and no single reading is greater than 80% of the Subpart GG sulfur limit, GPB may reduce the sulfur content monitoring frequency to twice per year during the first and third calendar quarters. c) Should any measurement taken under 2a or 2b indicate non-compliance with 40 CFR 60 Subpart GG, GPB upon learning of said non-compliance, shall immediately begin monitoring fuel content weekly. GPB shall, within 14 days of learning of said non-compliance, notify DES and EPA, such that the custom fuel monitoring schedule can be reexamined. d) Within 14 days of learning of any change in fuel supply or significant change in fuel quality, GPB shall notify EPA of the fuel supply change such that the custom fuel monitoring schedule can be reexamined. From the time of said notification, until a determination regarding the custom fuel monitoring schedule is made by EPA, fuel shall be monitored weekly.	As stated	EU3 & EU4	Temporary Permit FP-T-0051 Amended & 40 CFR 60 Subpart GG Section 60.334(b)(2)

Table 6 – Monitoring/Testing Requirements					
Item #	**Parameter**	**Method of Compliance**	**Frequency of Method**	**Device**	**Regulatory Cite**
6.	No. 2 Fuel Oil Sulfur and Nitrogen Content Verification (Custom fuel schedule for Subpart GG)	GPB must conduct monitoring of nitrogen and sulfur content of No. 2 fuel oil in accordance with Section 60.334(b)(2) of 40 CFR 60 Subpart GG. In that DES has delegation for approving custom fuel monitoring schedules, GPB shall be required to do the following monitoring of No. 2 fuel oil for consumption by the Combustion Turbine: For each delivery of No. 2 fuel oil, GPB shall conduct testing using the appropriate ASTM Method or retain certified delivery tickets from the fuel oil supplier which state the weight percent of sulfur and fuel bound nitrogen content to determine compliance with the sulfur and nitrogen content limitations required by 40 CFR 60 Subpart GG in this permit for liquid fuels.	As stated	EU3 & EU4	Temporary Permit FP-T-0051 Amended & 40 CFR 60 Subpart GG Section 60.334(b)(2)
7.	NOx RACT Compliance Testing	The Permittee shall perform compliance testing for NO_x, lb/MMBTU input, and lb/hr once every three years and no later than three years following the previous NO_x RACT testing performed by the Permittee. For purposes of NOx RACT, the Combustion Turbines shall meet the more stringent of Env-A 1211.06(c)(1)b. [42 ppmdv, corrected to 15% oxygen when operating on gas; 65 ppmdv, corrected to 15% oxygen when operating on No. 2 fuel oil] or 40 CFR 60, Subpart GG, Section 60.332(a)(2), when operating on gas. GPB shall use test methods contained in Env-A 1211.21.	Minimum of once every three years, after the initial performance test	EU3, & EU4	FP-T-0051, Env-A 802, & Env-A 1211.21 Federally Enforceable
8.	NOx RACT Compliance Testing	The Permittee shall perform compliance testing for NO_x, lb/MMBTU input, and lb/hr once every three years and no later than three years following the previous NO_x RACT testing performed by the Permittee. For purposes of NOx RACT, emissions from HRSG Units #1 & #2 shall be less than 0.10 lb/mmBtu, based on hourly average, as stated in Env-A 1211.05(c)(3)a.1. GPB shall use test methods contained in Env-A 1211.21.	Minimum of once every three years, after the initial performance test	EU5 & EU6	FP-T-0051, Env-A 802, & Env-A 1211.21 Federally Enforceable
9.	NOx RACT Compliance Testing	The Permittee shall perform compliance testing for NO_x, lb/MMBTU input, and lb/hr once every three years, separately for natural gas and fuel oil firing of the Boilers. GPB shall use test methods contained in Env-A 1211.21.	Minimum of once every three years	EU1 & EU2	FP-T-0051, Env-A 802, & Env-A 1211.21 Federally Enforceable
10.	NOx Emitting Generating Source Requirements	GPB is subject to HB 649 (Laws of N.H. 1999, Chapter 343) and any subsequent rules adopted pursuant to the authority under RSA 125-J:14. GPB shall install watt meters and recorders for the Combustion Turbines and keep records sufficient to demonstrate compliance with HB 649 and any subsequent rules thereafter.	Continuous basis	EU3 & EU4	Temporary Permit FP-T-0051 Amended

Table 6 – Monitoring/Testing Requirements					
Item #	**Parameter**	**Method of Compliance**	**Frequency of Method**	**Device**	**Regulatory Cite**
11.	Continuous Monitors (General)	GPB shall install, calibrate, certify, operate, and maintain according to the manufacturer's specifications, continuous monitoring systems (CMS, as defined in 40 CFR Section 63.2 as specified in paragraph (m) of 40 CFR Section 63.453. The CMS's shall include continuous recorders.	Continuous basis	EU8 & EU9	40 CFR 63 Subpart S Section 63.453(a)
12.	Alternative Control Option – Blow Heat Recovery LVHC Collection & Treatment	GPB shall install a vacuum monitoring system composed of a vacuum sensor/monitor and vent-open monitor on the digester blow tank vent line. GPB shall establish appropriate operating parameters to be monitored that demonstrate to the Administrator's satisfaction, continuous compliance with the applicable control requirements. The vent-open monitor shall be equipped with a continuous recorder that has an alarm on the header from the blow tank to the entrance of the direct contact condenser to ensure that the blow tank vapors are always drawn into the direct contact condenser and Nash- type vacuum pump following it.	Continuous basis	EU8	40 CFR 63 Subpart S Section 63.453(m) & Equivalency By Permit 40 CFR 63 Section 63.94 Federally Enforceable
13.	Alternative Control Option – Blow Heat Recovery LVHC Collection & Treatment	GPB shall install, calibrate, operate, and maintain a temperature indicator with continuous recorder and a flow meter with a continuous recorder on the cooling water supply to the blow heat direct contact condenser. GPB shall establish appropriate operating parameters to be monitored that demonstrate to the Administrator's satisfaction, continuous compliance with the applicable control requirements.	Continuous basis	EU8	40 CFR 63 Subpart S Section 63.453(m) & Equivalency By Permit 40 CFR 63 Section 63.94 Federally Enforceable
14.	Alternative Control Option – Blow Heat Recovery LVHC Collection & Treatment	GPB shall install, calibrate, operate, and maintain a flow meter with a continuous recorder on the condensate flow from the PL-13 Tank to the GPB effluent sump pit. GPB shall establish appropriate operating parameters to be monitored that demonstrate to the Administrator's satisfaction, continuous compliance with the applicable control requirements.	Continuous basis	EU8	40 CFR 63 Subpart S Section 63.453(m) & Equivalency By Permit 40 CFR 63 Section 63.94 Federally Enforceable

Table 6 – Monitoring/Testing Requirements					
Item #	**Parameter**	**Method of Compliance**	**Frequency of Method**	**Device**	**Regulatory Cite**
15.	Alternative Control Option – Evap. Area LVHC Collection & Treatment	GPB shall install, calibrate, operate, and maintain a vacuum monitor and continuous recorder on the direct contact condenser to ensure the blow heat recovery system Nash type vacuum pump is continuously pulling a vacuum and is recovering methanol from the exiting blow heat condenser outlet gas stream. GPB shall establish appropriate operating parameters to be monitored that demonstrate to the Administrator's satisfaction, continuous compliance with the applicable control requirements.	Continuous basis	EU9	40 CFR 63 Subpart S Section 63.453(m) & Equivalency By Permit 40 CFR 63 Section 63.94 Federally Enforceable
16.	Alternative Control Option – Evap. Area LVHC Collection & Treatment	GPB shall install, operate, and maintain a vacuum monitor and continuous recorder on each of the evaporator effects (5) to ensure the evaporator Nash type vacuum pumps are continuously pulling a vacuum and recovering non-condensibles methanol from the evaporator area LVHC sources. GPB shall establish appropriate operating parameters to be monitored that demonstrate to the Administrator's satisfaction, continuous compliance with the applicable control requirements.	Continuous basis	EU9	40 CFR 63 Subpart S Section 63.453(m) & Equivalency By Permit 40 CFR 63 Section 63.94 Federally Enforceable
17.	Alternative Control Option – Blow Heat Recovery Area & Evap. Area LVHC Collection & Treatment	Wastewater Treatment Plant Operators shall maintain in the operators logsheets all information as required by their NPDES Permit and associated "Operations Manual" which includes the following elements: a) Regular inlet BOD, and TSS b) Regular outlet BOD, TSS, pH, turbidity, and temperature c) Regular primary clarifier and sludge TSS d) Regular aeration basin effluent Dissolved Oxygen, MLSS, RAS TSS, WAS TSS, and Settlometer/SVI testing e) Daily total inlet flow from Wausau and GPB f) Daily total outlet flow In addition, GPB shall identify and demonstrate the appropriate monitoring parameters for the wastewater collection and treatment systems to determine continuous compliance with the equivalent methanol destruction.	As stated	EU8 & EU9	40 CFR 63 Subpart S Section 63.453(m) & Equivalency By Permit 40 CFR 63 Section 63.94 Federally Enforceable

Table 6 – Monitoring/Testing Requirements					
Item #	**Parameter**	**Method of Compliance**	**Frequency of Method**	**Device**	**Regulatory Cite**
18.	Alternative Control Option – Blow Heat Recovery Area & Evap. Area LVHC Collection & Treatment	Quarterly methanol emissions reductions shall be calculated at the wastewater treatment plant. GPB shall determine the biodegradation rate for methanol as described in 40 CFR 63, Appendix C, E. Multiple Zone Concentration Measurements (Procedure 5). In addition, GPB shall collect a 24-hour composite sample of blow heat condenser condensate, blow heat condenser system Nash-type vacuum pump liquid discharge and each of the two evaporator area Nash-type vacuum pump liquid discharges, and analyze for methanol concentration following NCASI Method DI/MEOH-94.02, Methanol in Process Liquids by GC/FID, August 1998, Methods Manual, NCASI, Research Triangle Park, NC. This test method is incorporated by reference in 40 CFR 63.14(f). GPB shall quantify the flow of blow heat condenser condensate, flow of blow heat condenser system Nash-type vacuum pump liquid discharge, flow of each of the evaporator area Nash-type vacuum pump liquid discharges, and pulp production rate (oven dry tons pulp produced) during this 24-hour sampling period. In order to determine compliance with the 40 CFR 63 Subpart S equivalent methanol reduction required on a pound per oven dry ton basis (98 percent of the digester and evaporator vents emissions), GPB shall determine the sums of the mass flow rate of methanol in the blow heat condenser condensate, blow heat condenser system Nash-type vacuum pump liquid discharge, and each of the two evaporator area Nash-type vacuum pump liquid discharges to the effluent treatment plant (in pounds per 24-hour sampling period) and subtract the loss from open sources as determined over a 24-hour period using the procedures in Table 8, Item 18.g) and multiply it by the biodegradation rate for methanol as a fraction and divide by the oven dry tons pulp produced in the 24-hour sampling period.	As stated	EU8 & EU9	Equivalency By Permit 40 CFR 63 Section 63.94 Federally Enforceable
19.	Alternative Control Option – Blow Heat Recovery Area & Evap. Area LVHC Collection & Treatment	GPB shall visually inspect the condensate collection and transport system monthly for defects that could result in air emissions to the atmosphere. GPB shall inspect for structural and mechanical defects including, but not limited to, visible cracks, holes, breaks, as well as damaged seals or joints. In the event that GPB detects a defect, GPB shall attempt to repair the defect within 5 days. GPB shall repair the defect no later than 15 days from detection, except when the operations providing condensates to the collection and transport system must be shut down to allow for repair. In this case, GPB shall complete the repair the next time the operations providing condensates shutdown.	As stated	EU8 & EU9	Equivalency By Permit 40 CFR 63 Section 63.94 Federally Enforceable

Table 6 – Monitoring/Testing Requirements					
Item #	**Parameter**	**Method of Compliance**	**Frequency of Method**	**Device**	**Regulatory Cite**
20.	Alternative Control Option – Blow Heat Recovery Area & Evap. Area LVHC Collection & Treatment	GPB shall visually inspect each enclosure and closed-vent system identified in Table 5A, Item 37, every 30 days. For each enclosure opening, the inspection shall include a visual inspection of the closure mechanism to ensure the opening is maintained in the closed position and sealed. The visual inspection of each closed-vent system shall include inspection of ductwork, piping, enclosures, as well as seals, gaskets, and connections to covers for visible evidence of defects.	As stated	EU8 & EU9	Equivalency By Permit 40 CFR 63 Section 63.94 Federally Enforceable
21.	Alternative Control Option - Blow Heat Recovery & Evap. Area LVHC Collection & Treatment	To establish or reestablish, the value for each operating parameter required to be monitored under paragraph (m) of Section 63.453 or to establish appropriate parameters for paragraph (m) of Section 63.453, GPB shall use the following procedures: 1. During the initial performance test required in Section 63.457(a) or any subsequent performance test, continuously record the operating parameter; 2. Determinations shall be based on the control performance and parameter data monitored during the performance test, supplemented if necessary by engineering assessments and the manufacturer's recommendations; 3. The owner or operator shall provide for the Administrator's approval the rationale for the selecting the monitoring parameters necessary to comply with paragraph (m) of this section; and 4. Provide for the Administrator's approval the rationale for the selected operating parameter value, and monitoring frequency, and averaging time. Include all data and calculations used to develop the value and a description of why the value, monitoring frequency, and averaging time demonstrate compliance with the applicable emission standard.	As stated	EU8 & EU9	40 CFR 63 Subpart S Section 63.453(n)
22.	HAP Measurement	For purposes of complying with the requirements of Sections 63.443, 63.444, 63.447, and all equivalency by permit conditions related to the alternative control option contained in this Title V Operating Permit, GPB shall measure the total HAP concentration as methanol.	As stated	EU8 & EU9	40 CFR 63 Subpart S Section 63.457(f)

Table 6 – Monitoring/Testing Requirements					
Item #	**Parameter**	**Method of Compliance**	**Frequency of Method**	**Device**	**Regulatory Cite**
23.	Monitoring parameter(s) for the recovery kiln	In that GPB is using an air pollution control system other than those listed in paragraphs Section 63.864(a)(1) through (3), it must monitor the parameter or parameters as approved by the Administrator using the methods and procedures in Section 63.865(f). (GPB has opted for a new way of introducing the spent cooking liquor into the recovery kiln for combustion, which will meet the emissions limitations for THC of 2.97 lb/ton black liquor solids fired.)	To be determined during performance test	EU7	40 CFR 63 Subpart MM Section 63.864(a)(5)
24.	Monitoring black liquor solids fired in the recovery kiln	GPB shall monitor and keep records of pounds or tons of black liquor solids fired per day for the recovery kiln.	Daily, on a continuous basis	EU7	State Permit to Operate PO-BP-2240 Federally Enforceable
25.	Monitoring of fuel oil consumption by the recovery kiln	GPB shall monitor the daily consumption of No. 2 and No. 6 fuel oil fired by the recovery kiln and retain records of this information for the purpose of annual fuel usage reporting, annual emissions reporting, and NOx reporting requirements.	Daily, on a continuous basis	EU7	State Permit to Operate PO-BP-2240 Federally Enforceable
26.	On-going compliance provisions	Following the compliance date, i.e., March 13, 2004, owners or operators of all affected sources or process units are required to implement corrective action, as specified in the startup, shutdown, and malfunction plan prepared under Section 63.866(a) if the monitoring exceedances in paragraph 63.864(c)(iv) of this section occur, i.e.: For an affected source or process unit equipped with an alternative emission control system approved by the Administrator, when any 3-hour average value is outside the range of parameter values established in Section 63.864(b)(2)	If an exceedance occurs	EU7	40 CFR 63 Subpart MM Section 63.864(c)(1)

Table 6 – Monitoring/Testing Requirements					
Item #	**Parameter**	**Method of Compliance**	**Frequency of Method**	**Device**	**Regulatory Cite**
27.	On-going compliance provisions	Following the compliance date, i.e., March 13, 2004, owners or operators of all affected sources or process units are in violation of the standards of Section 63.862 if the monitoring exceedances in Section 63.864(c)(2)(v) occurs, i.e.: For an affected source or process unit equipped with an alternative air pollution control system approved by the administrator, when six or more 3-hour average values within any 6-month reporting period are outside the range of parameter values established in Section 63.864(b)(2). For purposes of determining the number of non-opacity monitoring exceedances, no more than one exceedance will be attributed in any given 24-hour period.	As stated	EU7	40 CFR 63 Subpart MM Section 63.864(c)(2), (3)
28.	NOx RACT Compliance Testing	The Permittee shall perform compliance testing for NO_x, lb/ton black liquor solids fired once every three years. GPB shall use test methods contained in Env-A 1211.21. In addition, if the permittee wishes to establish new operating parameter ranges for the wet venturi scrubber or wet electrostatic precipitator, it may conduct such testing in conjunction with the required NOx RACT compliance testing. EPA Methods 1, 2, 3, & 5 from 40 CFR 60 Appendix A or Division approved alternatives shall be used for such particulate matter testing of the Recovery Kiln.	Minimum of once every three years	EU7	Env-A 802, & Env-A 1211.21 Federally Enforceable

E. Pre-Test Requirements

As part of GPB's alternative control option for methanol destruction and its equivalency by permit approval, GPB must conduct a Pre-Test of the affected sources. GPB must conduct all of the elements listed in Table 7 below:

Table 7 – Pre-Test Requirements

Item #	Requirement	Regulatory Cite
1.	Prior to conducting the performance test, GPB shall conduct a Pre-Test. The purpose of the Pre-Test is to establish baseline methanol emissions prior to the alternative control option, an initial determination of alternate parameters to be monitored for purposes of demonstrating continuous compliance with the equivalent emissions limitations to Section 63.443(d), and determining the equivalent emission limitation to Section 63.443(d).	Equivalency By Permit 40 CFR 63 Section 63.94 Federally Enforceable
2.	30 days prior to conducting the 30-day pre-testing and performance tests, GPB shall submit a sampling and test protocol to DES and EPA for review and comment. GPB shall incorporate all applicable test methods and procedures from 40 CFR 63.457(b)(1) through (b)(6) for sampling and determining methanol concentration in gaseous streams in the sampling and test protocol. GPB shall incorporate all applicable test methods and procedures from 40 CFR 63.457(c) for sampling and determining methanol concentration in liquid streams in the sampling and test protocol. GPB shall include test methods and procedures contained in Appendix C to Part 63 – Determination of the Fraction Biodegraded In a Biological Treatment Unit, E. Multiple Zone Concentration Measurements (Procedure 5) in its sampling and test protocol for determining the biodegradation rate of its effluent treatment plant. In addition, GPB shall identify and demonstrate all alternative parameters to be monitored and frequency of such monitoring as part of establishing operating parameter ranges, which ensure continuous compliance with the equivalent emissions limitations to Section 63.443(d).	Equivalency By Permit 40 CFR 63 Section 63.94 Federally Enforceable
3.	Before GPB begins installation of and process modifications to the blow heat recovery system and evaporator area LVHC collection system, it shall conduct the testing listed below in Items 4. through 10. of this Table, with DES personnel on-site to witness all such testing. During the periods of testing, the mill shall be operating under normal production operating conditions, i.e., representative performance based on full-scale production for a period of 30 days. The 30-day period of time is due to the amount of sampling and testing required. GPB shall establish baseline emissions from the direct contact condenser and the two evaporator area LVHC sources which must be controlled, baseline gaseous emissions from selected open processes identified in Table 7, Item 6., and the associated equivalency demonstration to 98% reduction as required by Section 63.443(d), as described in the following pre-testing requirements.	Equivalency By Permit 40 CFR 63 Section 63.94 Federally Enforceable

4.	GPB shall conduct 2 complete tests during the 30-day test period for the direct contact condenser. Each test shall include the following data collection: a) Flow and methanol analysis of the gas stream leaving the direct contact condenser according to the procedures in 40 CFR Section 63.457(b); b) Flow and methanol analysis of the condensate stream leaving the direct contact condenser according to the procedures in 40 CFR Section 63.457(c); and c) Flow, temperature, and methanol analysis of the cooling water supplied to the condenser according to the procedures in 40 CFR Section 63.457(c).	Equivalency By Permit 40 CFR 63 Section 63.94 Federally Enforceable
5.	GPB shall conduct 2 complete tests during the 30-day test period for the blow heat recovery system Nash-type vacuum pump and the two, evaporator area Nash-type vacuum pumps. Each test shall include the following data collection: a) Gas flow rate and methanol concentration entering the vacuum pump according to the procedures in 40 CFR Section 63.457(b); b) Gas flow rate and methanol concentration exiting the vacuum pump according to the procedures in 40 CFR Section 63.457(b); c) Seal water flow, temperature, and methanol concentration entering the vacuum pump according to the procedures in 40 CFR Section 63.457(c); and d) Seal water flow, temperature, and methanol concentration exiting the vacuum pump according to the procedures in 40 CFR Section 63.457(c).	Equivalency By Permit 40 CFR 63 Section 63.94 Federally Enforceable
6.	GPB shall conduct 2 complete tests for baseline gaseous methanol emissions from the following selected open processes during the 30-day test period according to the procedures in 40 CFR 63.457(b): a) Kraft Pulper Exhaust (Stack ID 25) b) Paper Machine Dry End Exhaust (Stack ID 28) c) Paper Machine Dry End Exhaust (Stack ID 29) d) Paper Machine Hood Exhaust (Stack ID 30) e) Paper Machine Wet End Exhaust (Stack ID 31) f) Paper Machine Saveall Exhaust (Stack ID 37) g) Paper Machine Vacuum Pump Exhaust (Stack ID 38) h) Paper Machine Vacuum Pump Exhaust (Stack ID 39) i) Filtrate Tank Vent (Stack ID 43) j) #1 Brown Stock Washer Exhaust (Stack ID 44) k) #2 Brown Stock Washer Exhaust (Stack ID 45) l) #3 Brown Stock Washer Exhaust (Stack ID 46) m) Wet End Vapor Vent	Equivalency By Permit 40 CFR 63 Section 63.94 Federally Enforceable
7.	To determine total quantities of methanol destroyed, GPB shall obtain daily flow data and samples from the liquid discharges according to the procedures in 40 CFR Section 63.457(c) of the two, evaporator area Nash-type vacuum pumps, the blow heat condenser Nash-type vacuum pump, and the direct contact condenser condensate Weekly composites shall be made of these four sample sources and methanol analyses shall be conducted along with computation of mass flow rates and mass flow rates of methanol for each of the sources sampled.	Equivalency By Permit 40 CFR 63 Section 63.94 Federally Enforceable

8.	During the 30-day testing period, GPB shall conduct the following: a) GPB shall record the daily oven dry ton pulp production for the 30-day testing period; b) GPB shall perform BOD sampling and analysis of 4 influent samples to the effluent treatment plant and 3 effluent treatment plant discharge samples per week. In addition, GPB shall monitor the appropriate monitoring parameters for the wastewater collection and treatment systems to determine continuous compliance with the equivalent methanol destruction. c) GPB shall calculate the weekly methanol loading to the effluent treatment plant from the condenser condensate and three vacuum pump liquid discharges. d) During each test run, GPB shall record the hourly oven dry tons of pulp production.	Equivalency By Permit 40 CFR 63 Section 63.94 Federally Enforceable
9.	After completion of monitoring, sampling, and testing, GPB shall perform the following: a) GPB shall calculate the baseline methanol emissions leaving in the gaseous stream from the direct contact condenser to the blow heat recovery system vacuum pump and the gaseous streams entering each of the two, evaporator area vacuum pumps. For purposes of establishing the equivalency in methanol reduction required by Section 63.443(d), GPB shall sum up the average gaseous methanol emissions from the direct contact condenser and the two evaporator area vacuum pumps and divide by the average oven dry ton pulp production rate and multiply by 0.98. b) GPB shall determine a methanol degradation rate for the WWTP, once a week, for four separate weeks during the testing following the test method and procedures in 40 CFR 63, Appendix C, E. Multiple Zone Concentration Measurements (Procedure 5). c) GPB shall then calculate the minimum BOD removal efficiency. GPB shall also determine the minimum or maximum (as appropriate) operating parameter values needed to ensure the methanol reduction equivalency to Section 63.443(d) determined above. d) GPB shall calculate gaseous methanol emissions from open process sources sampled and tested. e) GPB shall use Water 8/9 modeling to determine air emissions of methanol from the wastewater treatment plant. Include in this determination all losses to the atmosphere from all open sources during the transport of condensates from the direct contact condenser and evaporator area Nash-type vacuum pumps to the aeration basis. These open sources include, but are not limited to, the open troughs, the primary clarifier, and the headbox to the wastewater treatment plant.	Equivalency By Permit 40 CFR 63 Section 63.94 Federally Enforceable
10.	GPB shall submit results of the Pre-testing to DES and EPA within 30 days of completion of testing for review.	Equivalency By Permit 40 CFR 63 Section 63.94 Federally Enforceable

F. Performance Testing Requirements:

The Permittee shall conduct emissions testing on the Combustion Turbines #1 & #2 (EU3 and EU4) and Heat Recovery Steam Generating Units #1 & #2 (EU5 and EU6) and Alternative Control Option according to the requirements identified in Table 8 below:

Table 8 – Performance Testing Requirements

Item #	Requirement	Regulatory Cite.
1.	In accordance with 40 CFR 60, Subpart A, §60.8(a), within 60 days after achieving the maximum production rate, and not later than 180 days after initial startup, GPB is required to conduct a performance test on each Combustion Turbine without its corresponding HRSG in service separately for natural gas firing and while firing No. 2 fuel oil, and furnish the results of such testing to the DES within 30 days after completion of testing. GPB is also required to conduct performance tests on each HRSG Unit firing natural gas at full load without its corresponding combustion turbine in service. In addition, GPB will conduct a performance test on the combined operation of the Combustion Turbine and corresponding HRSG unit at maximum operating capacity for both cases of operation, i.e. Turbine firing No. 2 fuel oil/HRSG firing natural gas **AND** Turbine/HRSG both firing natural gas. In conducting the performance tests required in §60.8, GPB shall use as reference methods and procedures the test methods in 40 CFR 60, Appendix A, or other methods and procedures as specified in 40 CFR 60, Subpart GG, §60.335(c). GPB shall determine compliance with the nitrogen oxides and sulfur dioxide standards in §60.332 and §60.333(a) as follows: (1) The nitrogen oxides emission rate (NOx) shall be computed for each run using the following equation: NOx = (NOxo)*(Pr/Po)*0.5e19*(Ho-0.00633)*(288 deg K/Ta)*1.53 Where: NOx = emission rate of NOx at 15 percent O2 and ISO standard ambient conditions, volume percent. NOxo = observed NOx concentration, ppm by volume. Pr = reference combustor inlet absolute pressure at 101.3 kilopascals ambient pressure, mm Hg. Po = observed combustor inlet absolute pressure at test, mm Hg. Ho = observed humidity of ambient air, g H2O/g air. E = transcendental constant, 2.718. Ta = ambient temperature, deg K (2) The natural gas and No. 2 fuel oil fuel flow meters shall be used to determine the fuel consumption necessary to comply with the standards for nitrogen oxide in §60.332 at 30, 50, 75, and 100 percent of peak load or at four points in the normal operating range of the turbine, including the minimum point in the range and peak load (GPB shall test at 55, 70, 85, & 100%). All loads shall be corrected to ISO conditions using the appropriate equations supplied by the manufacturer. (3) Method 20 shall be used to determine the nitrogen oxides, sulfur dioxide, and oxygen concentrations. The span values shall be 300 ppm of nitrogen oxide and 21 percent oxygen. The NOx emissions shall be determined at each of the load conditions specified in paragraph (2) above.	40 CFR 60 Subpart A Section 60.8(a), Temporary Permit FP-T-0051 Federally Enforceable

Table 8 – Performance Testing Requirements		
Item #	**Requirement**	**Regulatory Cite.**
2.	GPB shall conduct the following tests while running each of the turbines only, while firing natural gas only at 55, 70, 85, and 100% load or at four points in the normal operating range: 1. NOx – Method 7E, with use of equation in A. above; 2. CO – Method 10; 3. %O2/CO2 – Method 3; and 4. Fuel sulfur analysis of composite sample of natural gas – ASTM Method.	Temporary Permit FP-T-0051 Amended Federally Enforceable
3.	GPB shall conduct the following tests while running each of the turbines only, while firing No. 2 fuel oil at 55, 70, 85, and 100% load or at four points in the normal operating range: 1. NOx – Method 7E, with use of equation in A. above; 2. CO – Method 10; 3. %O2/CO2 – Method 3; 4. Volumetric Flow – Methods 1 & 2 at 100% load only; 5. %Moisture – Method 4 at 100% load only; 6. PM10 – Methods 201A/202 at 100% load only; 7. VOC – Method 25A at 100% load only; and 8. Fuel sulfur analysis of composite sample of No. 2 fuel oil.	Temporary Permit FP-T-0051 Amended Federally Enforceable
4.	GPB shall also test the combined operation of each of the turbines while firing natural gas at 100% load combined with the associated HRSG Unit firing natural gas at 100% load and test the emissions at the outlet of the HRSG Unit for the following: 1. Volumetric Flow – Methods 1 & 2; 2. %O2/CO2 – Method 3; 3. %Moisture – Method 4; 4. NOx – Method 7E; 5. CO – Method 10; and 6. Fuel sulfur analysis of composite sample of natural gas – ASTM Method.	Temporary Permit FP-T-0051 Amended Federally Enforceable
5.	GPB shall also test the combined operation of each of the turbines while firing No. 2 fuel oil at 100% load combined with the associated HRSG Unit firing natural gas at 100% load and test the emissions at the outlet of the HRSG Unit for the following: 1. Volumetric Flow – Methods 1 & 2; 2. %O2/CO2 – Method 3; 3. %Moisture – Method 4; 4. NOx – Method 7E; 5. CO – Method 10; and 6. Fuel sulfur analysis of composite samples of natural gas and No. 2 fuel oil – ASTM Methods.	Temporary Permit FP-T-0051 Amended Federally Enforceable

Table 8 – Performance Testing Requirements		
Item #	**Requirement**	**Regulatory Cite.**
6.	GPB shall test each of the HRSG Units at 50, 75 and 100 percent load while firing natural gas and on fresh air makeup without its corresponding Combustion Turbine in operation. Emissions shall be tested at the outlet of the HRSG Unit for the following: 1. Volumetric Flow – Methods 1 & 2; 2. %O2/CO2 – Method 3; 3. %Moisture – Method 4; 4. NOx – Method 7E; 5. CO – Method 10; and 6. Fuel sulfur analysis of composite samples of natural gas – ASTM Methods.	Temporary Permit FP-T-0051 Amended Federally Enforceable
7.	Testing shall be conducted and the results reported in accordance with 40 CFR 60, Sections 60.8 (a), (b), (d), (e), and (f), Appendix A, the Division's Policy "Procedures and Minimum Requirements for Stack Tests". The following test methods or Division approved alternatives shall be used: a) Compliance testing for stack flow, moisture, oxygen, carbon dioxide, and particulate matter shall be conducted using EPA Methods 1 through 5; b) Compliance testing for NOx shall be conducted using EPA Method 7E; c) Compliance testing for CO shall be conducted using EPA Method 10; d) Compliance testing for opacity shall be conducted using EPA Method 9; and e) Compliance testing for VOC shall be conducted using EPA Method 25A.	40 CFR 60 Subpart A Section 60.8(a), Temporary Permit FP-T-0051 Federally Enforceable
8.	Compliance testing shall be planned and carried out in accordance with the following schedule: 1. At least 30 days prior to the commencement of testing, GPB shall submit to the Division a pretest report presenting the following information: a) Calibration methods and sample data sheets; b) Description of the test methods to be used; c) Pre-test preparation procedures; d) Sample collection and analysis methods; e) Process data to be collected; and f) Complete test program description. 2. At least 15 days prior to the test date, GPB and any contractor that GPB retains for performance of the test, shall participate in a pretest conference with a Division representative. 3. Emission testing shall be carried out under the observation of a Division representative. 4. Within 30 days after completion of testing, GPB shall submit a test report to the Division.	40 CFR 60 Subpart A Section 60.8(a), Temporary Permit FP-T-0051 Federally Enforceable
9.	Any compliance stack test results determined following 40 CFR 60 Subpart A Section 60.8, which show violations of any permit requirement shall be considered violations of this permit.	Temporary Permit FP-T-0051 Federally Enforceable

Table 8 – Performance Testing Requirements		
Item #	**Requirement**	**Regulatory Cite.**
10.	An initial performance test is required for all emission sources subject to the equivalent emission limitation to that contained in Section 63.443(d).	Equivalency By Permit 40 CFR 63 Section 63.94 Federally Enforceable
11.	30 days prior to conducting the 30-day pre-testing and performance tests, GPB shall submit a sampling and test protocol to DES and EPA for review and comment. GPB shall incorporate all applicable test methods and procedures from 40 CFR 63.457(b)(1) through (b)(6) for sampling and determining methanol concentration in gaseous streams in the sampling and test protocol. GPB shall incorporate all applicable test methods and procedures from 40 CFR 63.457(c) for sampling and determining methanol concentration in liquid streams in the sampling and test protocol. GPB shall include test methods and procedures contained in Appendix C to Part 63 – Determination of the Fraction Biodegraded In a Biological Treatment Unit, E. Multiple Zone Concentration Measurements (Procedure 5) in its sampling and test protocol for determining the biodegradation rate of its effluent treatment plant. In addition, GPB shall identify and demonstrate all alternative parameters to be monitored and frequency of such monitoring as part of establishing operating parameter ranges, which ensure continuous compliance with the equivalent emissions limitations to Section 63.443(d).	Equivalency By Permit 40 CFR 63 Section 63.94 Federally Enforceable
12.	Within 60 days of completion of the installation and process modifications to the blow heat recovery system and evaporator area LVHC collection system, GPB shall conduct a Performance Test of the alternative control option to determine its effectiveness in destruction of methanol. GPB shall conduct all of the elements listed below in Table 8 (Items 13 through 18). 30 days prior to conducting the 30-day performance test, GPB shall submit a sampling and test protocol to DES and EPA for review and comment. Success or failure of the alternative control option shall be determined by comparison of the methanol removed in lb/ODTP production from the performance test with the equivalent methanol destruction required by Section 63.443(d). The equivalent methanol destruction shall be determined by averaging the results of the performance tests and shall be incorporated into the Title V Operating Permit via a permit amendment, in accordance with Env-A 612.04. The minimum BOD removal efficiency for the effluent treatment plant and any other alternative parameters identified in the pre-testing or performance test needed to ensure the equivalent methanol destruction required by Section 63.443(d) shall be used as parametric monitoring variables to ensure compliance with the emission reductions required. This minimum BOD removal efficiency and all other alternate parameters, and operating parameter ranges shall then be incorporated into the facility's Title V Operating Permit via a permit amendment, in accordance with Env-A 612.04. GPB shall submit results of the performance test to DES and EPA within 30 days of completion of testing for review. The results shall include proposed monitoring parameters of open sources and proposed parameters to monitor the performance of the open biological treatment unit for DES and EPA approval.	Equivalency By Permit 40 CFR 63 Section 63.94 Federally Enforceable

Table 8 – Performance Testing Requirements		
Item #	**Requirement**	**Regulatory Cite.**
13.	GPB shall conduct 2 complete tests during the 30-day test period for the direct contact condenser. Each test shall include the following data collection: a) Flow and methanol analysis of the gas stream leaving the direct contact condenser according to the procedures in 40 CFR Section 63.457(b); b) Flow and methanol analysis of the condensate stream leaving the direct contact condenser according to the procedures in 40 CFR Section 63.457(c); and c) Flow, temperature, and methanol analysis of the cooling water supplied to the condenser according to the procedures in 40 CFR Section 63.457(c).	Equivalency By Permit 40 CFR 63 Section 63.94 Federally Enforceable
14.	GPB shall conduct 2 complete tests during the 30-day test period for the blow heat recovery system Nash-type vacuum pump and the two, evaporator area Nash-type vacuum pumps. Each test shall include the following data collection: a) Gas flow rate and methanol concentration entering the vacuum pump according to the procedures in 40 CFR Section 63.457(b); b) Gas flow rate and methanol concentration exiting the vacuum pump according to the procedures in 40 CFR Section 63.457(b); c) Seal water flow, temperature, and methanol concentration entering the vacuum pump according to the procedures in 40 CFR Section 63.457(c); and d) Seal water flow, temperature, and methanol concentration exiting the vacuum pump according to the procedures in 40 CFR Section 63.457(c).	Equivalency By Permit 40 CFR 63 Section 63.94 Federally Enforceable
15.	GPB shall conduct 2 complete tests for baseline gaseous methanol emissions from the following selected open processes during the 30-day test period according to the procedures in 40 CFR 63.457(b): a) Kraft Pulper Exhaust (Stack ID 25) b) Paper Machine Dry End Exhaust (Stack ID 28) c) Paper Machine Dry End Exhaust (Stack ID 29) d) Paper Machine Hood Exhaust (Stack ID 30) e) Paper Machine Wet End Exhaust (Stack ID 31) f) Paper Machine Saveall Exhaust (Stack ID 37) g) Paper Machine Vacuum Pump Exhaust (Stack ID 38) h) Paper Machine Vacuum Pump Exhaust (Stack ID 39) i) Filtrate Tank Vent (Stack ID 43) j) #1 Brown Stock Washer Exhaust (Stack ID 44) k) #2 Brown Stock Washer Exhaust (Stack ID 45) l) #3 Brown Stock Washer Exhaust (Stack ID 46) m) Wet End Vapor Vent	Equivalency By Permit 40 CFR 63 Section 63.94 Federally Enforceable
16.	To determine total quantities of methanol destroyed, GPB shall obtain daily flow data and samples from the liquid discharges according to the procedures in 40 CFR Section 63.457(c) of the two, evaporator area Nash-type vacuum pumps, the blow heat condenser Nash-type vacuum pump, and the direct contact condenser condensate Weekly composites shall be made of these four sample sources and methanol analyses shall be conducted along with computation of mass flow rates and mass flow rates of methanol for each of the sources sampled.	Equivalency By Permit 40 CFR 63 Section 63.94 Federally Enforceable

Table 8 – Performance Testing Requirements		
Item #	**Requirement**	**Regulatory Cite.**
17.	During the 30-day testing period, GPB shall conduct the following: a) GPB shall record the daily oven dry ton pulp production for the 30-day testing period; b) GPB shall perform BOD sampling and analysis of 4 influent samples to the effluent treatment plant and 3 effluent treatment plant discharge samples per week. In addition, GPB shall monitor the appropriate monitoring parameters for the wastewater collection and treatment systems to determine continuous compliance with the equivalent methanol destruction. c) GPB shall calculate the weekly methanol loading to the effluent treatment plant from the condenser condensate and three vacuum pump liquid discharges. d) During each test run, GPB shall record the hourly oven dry tons of pulp production.	Equivalency By Permit 40 CFR 63 Section 63.94 Federally Enforceable
18.	After completion of monitoring, sampling, and testing, GPB shall perform the following: a) GPB shall calculate the baseline methanol emissions leaving in the gaseous stream from the direct contact condenser to the blow heat recovery system vacuum pump and the gaseous streams entering each of the two, evaporator area vacuum pumps. For purposes of establishing the equivalency in methanol reduction required by Section 63.443(d), GPB shall sum up the average gaseous methanol emissions from the direct contact condenser and the two evaporator area vacuum pumps and divide by the average oven dry ton pulp production rate and multiply by 0.98. b) GPB shall determine a methanol degradation rate for the WWTP, once a week, for four separate weeks during the testing following the test method and procedures in 40 CFR 63, Appendix C, E. Multiple Zone Concentration Measurements (Procedure 5). c) GPB shall then calculate the minimum BOD removal efficiency. GPB shall also determine the minimum or maximum (as appropriate) operating parameter values needed to ensure the methanol reduction equivalency to Section 63.443(d) determined above. d) GPB shall calculate gaseous methanol emissions from open process sources sampled and tested. e) GPB shall summarize alternative parameters monitored during the testing and include proposed operating ranges, which ensure continuous compliance with the equivalent methanol emission limitation to Section 63.443(d). f) GPB after completing the performance test shall then show via a table, the reductions in gaseous methanol emissions from the open process sources sampled and tested. g) GPB shall use Water 8/9 modeling to determine air emissions of methanol from the wastewater treatment plant. Include in this determination all losses to the atmosphere from all open sources during the transport of condensates from the direct contact condenser and evaporator area Nash-type vacuum pumps to the aeration basis. These open sources include, but are not limited to, the open troughs, the primary clarifier, and the headbox to the wastewater treatment plant. h) GPB shall calculate methanol removed in lb/ODTP production from the performance test by averaging the results of the tests using the following equation: GPB shall determine the sums of the mass flow rate of methanol in the blow heat condenser condensate, blow heat condenser system Nash-type vacuum pump liquid discharge, and each of the two evaporator area Nash-type vacuum pump liquid discharges to the effluent treatment plant (in pounds per 24-hour sampling period) and subtract the loss from open sources over a 24-hour period as determined using the procedures in permit term g) above and multiply it by the biodegradation rate for methanol as a fraction and divide it by the oven dry tons pulp produced in the 24-hour sampling period.	Equivalency By Permit 40 CFR 63 Section 63.94 Federally Enforceable

Table 8 – Performance Testing Requirements		
Item #	**Requirement**	**Regulatory Cite.**
19.	Initial compliance determination for the recovery kiln: 1. The owner or operator of each affected source or process unit subject to the requirements of this subpart is required to conduct an initial performance test using the test methods and procedures listed in Section 63.7 and 63.865, except as provided in paragraph (b)(3) of Section 63.864. 2. Determination of operating ranges: During the initial performance test required in 1. above, the owner or operator of any affected source or process unit must establish operating ranges for the monitoring parameters in paragraph 63.864(a)(5). The initial performance test must be completed prior to March 13, 2004.	40 CFR 63 Subpart MM Section 63.864(b)(1), (2) Federally Enforceable
20.	For the recovery kiln compliance demonstration, GPB shall determine compliance with the gaseous organic HAP standard in Section 63.862(c)(2), i.e., 2.97 lb THC per ton black liquor solids fired, by using Method 25A in Appendix A of 40 CFR 60. The sampling time must be at least 60 minutes for each of the three test runs. GPB shall use Equation 11 in Section 63.865(d)(1) to determine the emission rate of gaseous organic HAPs.	40 CFR 63 Subpart MM Section 63.865(d) Federally Enforceable
21.	For the recovery kiln, GPB is seeking to comply with the continuous monitoring requirements of Section 63.864(b)(2) and must therefore continuously monitor each parameter and determine the arithmetic average value of each parameter during each 3-run performance test. Multiple 3-run performance tests may be conducted to establish a range of parameter values.	40 CFR 63 Subpart MM Section 63.865(e) Federally Enforceable
22.	In that GPB is seeking to demonstrate compliance with the gaseous organic HAP standard in Section 63.862(c)(2) using a control technique other than those listed in Section 63.864(a)(1) through (3), GPB must provide to the Administrator a monitoring plan that includes a description of the control device, test results verifying the performance of the control device, the appropriate operating parameters that will be monitored, and the frequency of measuring and recording to establish continuous compliance with the standards. The monitoring plan is subject to the Administrator's approval. GPB must install, calibrate, operate, and maintain the monitor(s) in accordance with the monitoring plan approved by the Administrator. GPB must include in the information submitted to the Administrator proposed performance specifications and quality assurance procedures for the monitor(s). The Administrator may request further information and will approve acceptable test methods and procedures.	40 CFR 63 Subpart MM Section 63.865(f) Federally Enforceable

G. Record keeping Requirements:

The Permittee shall be subject to the record keeping requirements identified in Table 9 below:

Table 9 – Applicable Record keeping Requirements

Item #	Applicable Record keeping Requirement	Records Retention Requirement	Applicable Emission Unit	Regulatory Cite.
1.	The Permittee shall retain records of all required monitoring and testing data, record keeping and reporting requirements, and support information for a period of at least 5 years from the date of origination.	Retain for a minimum of 5 years	Facility Wide	40 CFR 70.6(a)(3)(ii)(B) Federally Enforceable
2.	The Permittee shall maintain records of monitoring/testing requirements as specified in Tables 6, 7, and 8 of this Permit including, but not limited to: a) Preventative maintenance and inspection results for stacks, processes and boilers; b) Summary of maintenance and/or repair of the pollution control equipment (cyclones); c) Summary of maintenance and/or repair of the pitot tube associated with the stack volumetric flow measuring device; d) Summary of maintenance and/or repair of the CEM and COM systems; e) Summary of maintenance, repair, and calibration records for all fuel flow meters; and f) Performance tests conducted on the Combustion Turbines #1 & #2 and Heat Recovery Steam Generating Units #1 & #2. g) Pre-Test and Performance Tests conducted on the alternative control option. h) Performance Tests conducted on the recovery kiln. i) NOx RACT Test Results for combustion equipment at the facility.	Maintain on a continuous basis	Facility Wide	40 CFR 70.6(a)(3)(iii)(A) Federally Enforceable
3.	GPB shall follow record keeping and public availability requirements in Env-A 3106 for generation and use of DERs.	As required	EU3, EU4, EU5, EU6, & EU7	Temporary Permit FP-T-0051 & Env-A 3106 Federally Enforceable
4.	GPB is subject to HB 649 (Laws of N.H. 1999, Chapter 343) and any subsequent rules adopted pursuant to the authority under RSA 125-J:14. GPB shall install watt meters and recorders for the combustion turbines and keep records of kilowatts generated and hours of operation for each calendar month and any other records sufficient to demonstrate compliance with HB 649 and any subsequent rules thereafter.	Monthly	EU3 & EU4	Temporary Permit FP-T-0051 Federally Enforceable

Table 9 – Applicable Record keeping Requirements				
Item #	**Applicable Record keeping Requirement**	**Records Retention Requirement**	**Applicable Emission Unit**	**Regulatory Cite.**
5.	GPB shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation for each of the Combustion Turbines and HRSG Units; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative.	Maintain continuous records	EU3, EU4, EU5, & EU6	40 CFR 60 Subpart A Section 60.7(b) Federally Enforceable
6.	GPB shall maintain a file of all measurements, including continuous monitoring system, monitoring device (fuel flow meter), and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by this part recorded in a permanent form suitable for inspection. The file shall be retained for at least five years following the date of such measurements, maintenance, reports, and records.	Maintain continuous records for a minimum of five years	EU3, EU4, EU5, & EU6	40 CFR 60 Subpart A Section 60.7(f) Federally Enforceable
7.	GPB shall maintain records of all performance tests conducted on the Combustion Turbines and Heat Recovery Steam Generating Units.	Maintain continuous records for a minimum of five years	EU3, EU4, EU5, & EU6	Temporary Permit FP-T-0051 Amended Federally Enforceable
8.	GPB shall maintain records of the following information on a 24-hour calendar day basis for each of the Combustion Turbines and HRSG Units: a) The dates and times when each Combustion Turbine and HRSG Unit is run, including the total number of hours run each calendar day; b) Hours of operation of each HRSG Unit while fresh air firing without the associated Combustion Turbine in operation for each calendar day; c) The running total of days of operation in a continuous 365 rolling day period of time; d) The total daily, monthly, and calendar year natural gas and No. 2 fuel oil consumption in each of the Combustion Turbines and HRSG Units (MMCF, gal/day); e) Retain certified fuel supplier certificates indicating No. 2 fuel oil sulfur and fuel bound nitrogen content by weight information. Record any instances when fuel bound nitrogen and sulfur content are above permitted limits, indicating total quantities of fuel above such limits, date of delivery of such fuels, and period of time during which fuel fired in the Combustion Turbines exceed such limits; and f) Criteria pollutant emissions based on the more recent of vendor supplied emissions factors or the most recent performance test data.	Maintain on a continuous basis	EU3, EU4, EU5, & EU6	Temporary Permit FP-T-0051 Federally Enforceable

Table 9 – Applicable Record keeping Requirements				
Item #	**Applicable Record keeping Requirement**	**Records Retention Requirement**	**Applicable Emission Unit**	**Regulatory Cite.**
9.	GPB shall maintain records of the following information on a 24-hour calendar day basis for Boilers #4 & #5: a) The dates and times when each Boiler is run, including the total number of hours run each calendar day; b) The running total of days of operation in a continuous 365 rolling day period of time; c) The total daily, monthly, and calendar year natural gas and No. 6 fuel oil consumption in each of the Boilers (MMCF, gal/day); d) Retain certified fuel supplier certificates indicating No. 6 fuel oil sulfur content by weight information for each load of fuel received; and e) Criteria pollutant emissions based on the more recent of vendor supplied emissions factors or the most recent performance test data.	Maintain on a continuous basis	EU1 & EU2	Temporary Permit FP-T-0051 Federally Enforceable
10.	Billing tickets from the natural gas supplier for each month shall be kept on file in a form suitable for inspection and shall be made available to the Division upon request. Each billing ticket shall indicate the name, address, and telephone number of the natural gas supplier and the quantity of natural gas delivered.	Maintain on a continuous basis	Facility Wide	Temporary Permit FP-T-0051 Federally Enforceable
11.	Delivery tickets from each fuel oil supplier for each shipment of fuel oil received shall be kept on file in a form suitable for inspection and shall be available to the DES and/or EPA upon request. Each delivery ticket shall indicate: a) The name of the fuel supplier; b) The address of the fuel oil supplier; c) The telephone number of the fuel oil supplier; d) The quantity of fuel oil delivered; and e) The percent sulfur by weight of the fuel oil being delivered. If delivery tickets do not contain sulfur content of fuel being delivered, the Permittee shall perform testing in accordance with appropriate ASTM test methods to determine compliance with the sulfur content limitation provisions for each delivery of fuel oil.	Maintain on a continuous basis	Facility Wide	40 CFR 70.6(a)(3) & Env-A 1604.01 Federally Enforceable
12.	The owner or operator of each affected source subject to the requirements of Subpart S shall comply with the record keeping requirements of Section 63.10 of Subpart A of 40 CFR 63, as shown in Table 1 of Subpart S.	Maintain on a continuous basis	EU8 & EU9	40 CFR 63 Subpart S Section 63.454(a) Federally Enforceable

Table 9 – Applicable Record keeping Requirements				
Item #	**Applicable Record keeping Requirement**	**Records Retention Requirement**	**Applicable Emission Unit**	**Regulatory Cite.**
13.	Alternative Control Option Record keeping Requirements: a) GPB shall maintain records of weekly effluent treatment plant BOD removal efficiency. In addition, GPB shall list the minimum BOD removal efficiency required as determined by the Performance Test conducted at the facility. b) GPB shall maintain records of quarterly methanol emissions reductions testing. c) GPB shall maintain daily records of duration of any blow heat condenser system venting. d) GPB shall maintain records or copies of wastewater treatment plant operator's logsheets. e) GPB shall maintain daily records of hours of operation of the effluent treatment plant at less than the minimum BOD removal rate established during the Performance Test. f) GPB shall retain copies of all data collected during the Pre-Testing and Performance Tests and final reports of such testing for a minimum of five years. g) Maintain daily records of hours of operation of the blow heat recovery system; h) Maintain daily records of hours of operation of the evaporators; i) Maintain records of the temperature and flow of the cooling water to the direct contact condenser; j) Maintain records of the flow of condensates from the PL-13 condensate collection tank to the GPB effluent sump pit; k) Maintain records of the vacuum readings of the direct contact condenser and each of the evaporator effects; l) Maintain records of visual inspections done every 30 days for each enclosure and closed-vent system identified in Table 5A, Item 37; and m) GPB shall maintain records and keep on file all records for a minimum of five years.	Maintain on a continuous basis, for a minimum of five years	EU8 & EU9	Equivalency By Permit 40 CFR 63 Section 63.94 Federally Enforceable

Table 9 – Applicable Record keeping Requirements				
Item #	**Applicable Record keeping Requirement**	**Records Retention Requirement**	**Applicable Emission Unit**	**Regulatory Cite.**
14.	GPB shall prepare and maintain a site-specific inspection plan for each applicable enclosure opening, closed-vent system, and closed collection system, including a drawing or schematic of the components of applicable affected equipment and shall record the following information for each inspection as applicable: a) Date of inspection; b) The equipment type and identification; c) Results of negative pressure tests for enclosures; d) Results of leak detection tests; e) The nature of the defect or leak and the method of detection (i.e., visual inspection or instrument detection); f) The date the defect or leak was detected and the date of each attempt to repair the defect or leak; g) Repair methods applied in each attempt to repair the defect or leak; h) The reason for the delay if the defect or leak is not repaired within 15 days after discovery; i) The expected date of successful repair of the defect or leak if the repair is not completed within 15 days; j) The date of successful repair of the defect or leak; k) The position and duration of opening of bypass line valves and the condition of any valve seals; and l) The duration of the use of bypass valves on computer controlled valves.	Maintain continuous records	EU8 & EU9	40 CFR 63 Subpart S Section 63.454(b)

Table 9 – Applicable Record keeping Requirements				
Item #	**Applicable Record keeping Requirement**	**Records Retention Requirement**	**Applicable Emission Unit**	**Regulatory Cite.**
15.	Startup, shutdown, and malfunction plan: GPB must develop and implement a written plan as described in Section 63.6(e)(3) that contains specific procedures to be followed for operating the recovery kiln and maintaining the recovery kiln during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process and control systems used to comply with the standards. In addition to the information required in Section 63.6(e)(3), the plan must include the requirements in paragraphs (a)(1) and (2) of this section listed below as Items 1. and 2.: 1. Procedures for responding to any process parameter level that is inconsistent with the level(s) established under Section 63.864(b)(2), including the procedures in paragraphs (a)(1)(i) and (ii) of this section (a) and b) below): a) Procedures to determine and record the cause of an operating parameter exceedance and the time the exceedance began and ended; and b) Corrective actions to be taken in the event of an operating parameter exceedance, including procedures for recording the actions taken to correct the exceedance. 2. The startup, shutdown, and malfunction plan also must include the schedules listed in paragraphs (a)(2)(i) and (ii) of this section (a) and b) below): a) A maintenance schedule for each control technique that is consistent with, but not limited to, the manufacturer's instructions and recommendations for routine and long-term maintenance; and b) An inspection schedule for each continuous monitoring system required under Section 63.864 to ensure, at least once in each 24-hour period, that each continuous monitoring system is properly functioning.	Maintain on a continuous basis	EU7	40 CFR 63 Subpart MM Section 63.866(a) Federally Enforceable
16.	GPB must maintain records of any occurrence when corrective action is required under Section 63.864(c)(1), and when a violation is noted under Section 63.864(c)(2).	Maintain on a continuous basis	EU7	40 CFR 63 Subpart MM Section 63.866(b) Federally Enforceable

Table 9 – Applicable Record keeping Requirements				
Item #	**Applicable Record keeping Requirement**	**Records Retention Requirement**	**Applicable Emission Unit**	**Regulatory Cite.**
17.	GPB must maintain records of the following information with respect to the recovery kiln, which are applicable from Items (c)(1), (3), (4), and (5): 1. Records of black liquor solids firing rates in tons per day for the recovery kiln; 2. Records of parameter monitoring data required under Section 63.864, including any period when the operating parameter levels were inconsistent with the levels established during the initial performance test, with a brief explanation of the cause of the deviation, the time the deviation occurred, the time corrective action was initiated and completed, and the corrective action taken; 3. Records and documentation of supporting calculations for compliance determinations made under Section 63.865(a) through (e); and 4. Records of monitoring parameter ranges established for the recovery kiln.	Maintain on a continuous basis	EU7	40 CFR 63 Subpart MM Section 63.866(c) Federally Enforceable
18.	General Record keeping Requirements for Combustion Devices: GPB shall maintain monthly records of fuel characteristics and utilization for each combustion device, including: a) The quantity of fuel used on a 24-hour basis; b) The fuel type; and c) The sulfur content as percent sulfur by weight of fuel or in grains per 100 cubic feet of fuel. If more than one type of fuel is used, data on each fuel type shall be recorded separately.	Maintain on a continuous basis	Facility Wide	Temporary Permit FP-T-0051 Env-A 903.03 Federally Enforceable
19.	In that GPB has identified several alternate operating scenarios, it must contemporaneously with making a change from one operating scenario to another, record in a logbook at the facility a record of the scenario under which it is operating.	Maintain at facility at all times	EU1, EU2, EU3, EU4, EU5, & EU6	40 CFR 70.6(a)(9) Federally Enforceable
20.	Annual records of actual emissions for each significant and insignificant activity for determination of emission based fees.	Maintain at facility at all times	Significant and insignificant activities	Env-A 901.04 Federally Enforceable

Table 9 – Applicable Record keeping Requirements				
Item #	**Applicable Record keeping Requirement**	**Records Retention Requirement**	**Applicable Emission Unit**	**Regulatory Cite.**
21.	General NO_x Record keeping Requirements: The owner or operator of any stationary source, area source, or device subject to this part, shall record the following information and maintain such records at the facility: (a) Identification of each combustion device; (b) Operating schedule during the high ozone season for each combustion device identified in (a), above, including: (1) Hours of operation per calendar month; (2) Days of operation per calendar month; (3) Number of weeks of operation; (4) Type and amount of fuel burned for each combustion device; (5) Heat input rate in million BTUs per hour or, for incinerators, in tons per hour; and (6) The following NO_x emission data: a. Actual NOx emissions from each combustion device identified in (a) above for: 1. Each calendar year, in tons; and 2. A high ozone season day during that calendar year, in pounds per day; and b. The emission factors and the origin of the emission factors used to calculate the NOx emissions.	On a continuous basis	Facility Wide	Temporary Permit FP-T-0051 Env-A 905.02 Federally Enforceable

Table 9 – Applicable Record keeping Requirements				
Item #	**Applicable Record keeping Requirement**	**Records Retention Requirement**	**Applicable Emission Unit**	**Regulatory Cite.**
22.	General VOC Record keeping Requirements: The owner or operator of any stationary source, area source or device subject to this part shall record and maintain the following information at the facility: (a) Identification of each VOC-emitting process or device, except: (1) Processes or devices associated exclusively with non-core activities, as defined in Env-A 1204.03(ba); and (2) Processes or devices emitting only exempt VOCs as defined in Env-A 1204.03(z); (b) The operating schedule during the high ozone season for each VOC-emitting process or device identified in (a), above, including: (1) Hours of operation per calendar month; and (2) Days of operation per calendar month; (c) The following VOC emission data: (1) Actual VOC emissions from each VOC-emitting process or device identified in (a), above for: a. Each calendar year, in tons; and b. A high ozone season day during that calendar year, in pounds per day; and (2) The emission factors and the origin of the emission factors used to calculate the VOC emissions.	As stated	Facility Wide	Temporary Permit FP-T-0051 Env-A 904.02 Federally Enforceable

H. Reporting Requirements:

The Permittee shall be subject to the reporting requirements identified in Table 10 below:

Table 10 – Applicable Reporting Requirements

Item #	Reporting Requirements	Frequency of Reporting	Applicable Emission Unit	Regulatory Cite
1.	The Permittee shall submit a semi-annual summary report of monitoring data as specified in Table 7 of this permit including: a) Preventative maintenance and inspection results performed during the annual inspection as specified in Table 6, Item #1 for stacks and emission units; b) Summary of testing and/or delivery ticket certifications for fuel sulfur content limitation provisions; c) Summary of testing and/or delivery ticket certifications for specification waste oil sulfur content and contaminant content limitation provisions; and d) Summary of maintenance and repair records for the pollution control equipment (recovery kiln venturi scrubber and precipitator); e) Summary of maintenance and repair records for the stack volumetric flow measuring device; f) Summary of maintenance and repair records for the CEM and COM systems; g) Summary of maintenance, repair, and calibration records for all fuel flow meters; h) A Permit deviation report; and i) Summary of days operating in each alternative operating scenario.	Every 6 months (no later than the 30th day of the following month of each calendar half year) to DES and EPA	Facility Wide	40 CFR 70.6(a)(3)(iii)(A) Federally Enforceable
2.	GPB shall submit a Notice and Certification of Generation for DERs prior to the first day of the use period in accordance with Env-A 3103.08(b)(3).	As specified, to DES	EU3, EU4, EU5, EU6, & E**U7**	Temporary Permit FP-T-0051 & Env-A 3103.08(b)(3) Federally Enforceable
3.	GPB shall submit a Notice of Intent to Use DERs and Certification of Use prior to the issuance of Temporary Permit FP-T-0051 so they may be incorporated as attachments to the Temporary Permit as required by Env-A 3104.05.	As specified, to DES	EU3, EU4, EU5, EU6, & EU7	Temporary Permit FP-T-0051 & Env-A 3104.05 Federally Enforceable
4.	GPB shall follow procedures in Env-A 3103.08 for submission of annual Notice and Certification of Generation of DERs and follow procedures in Env-A 3104.08 for submission of annual Notice of Intent to Use DERs.	Annually, as specified, to DES	EU3, EU4, EU5, EU6, & EU7	Temporary Permit FP-T-0051, Env-A 3103.08, & Env-A 3104.08 Federally Enforceable

Table 10 – Applicable Reporting Requirements				
Item #	**Reporting Requirements**	**Frequency of Reporting**	**Applicable Emission Unit**	**Regulatory Cite**
5.	GPB shall submit an annual power generation report to DES, which shows monthly and calendar year total hours of operation and kilowatts of electricity generated for each of the combustion turbines.	Annually (no later than April 15th of the following year), to DES	EU3 & EU4	Temporary Permit FP-T-0051 Federally Enforceable
6.	GPB shall furnish the EPA and DES written notification of the date of construction for each of the Combustion Turbines and HRSG Units is commenced, postmarked no later than 30 days after such date. In addition, GPB shall submit a notification of the actual date of the initial startup for each of the Combustion Turbines and HRSG Units, postmarked within 15 days after such date.	As stated, to DES and EPA	EU3, EU4, EU5, & EU6	40 CFR 60 Subpart A Section 60.7(a) Federally Enforceable
7.	GPB shall submit a semi-annual excess emissions report to the EPA and DES, which identifies periods of excess emissions. Excess emissions of nitrogen oxides shall be any period during which the fuel-bound nitrogen of the fuel is greater than the maximum nitrogen content allowed by the fuel-bound nitrogen allowance used during the performance test. Excess emissions of sulfur dioxide shall be any daily period during which the sulfur content of the fuel being fired in the gas turbine exceeds 0.8 percent. Each report shall include the average fuel consumption, ambient conditions, gas turbine load, sulfur content, and nitrogen content of the fuel being fired during the period of excess emissions.	Semi-annually, by January 31st and July 31st for the preceding 6-month period, to DES and EPA	EU3 & EU4	40 CFR 60 Subpart A Section 60.7(c) Federally Enforceable
8.	GPB shall submit a semi-annual report to the DES and EPA at the addresses listed in Condition XXI.B. no later than 30 days following the end of each semi-annual period (i.e. by January 31st and July 31st) containing the following information: a) A summary and copies of billing tickets from the natural gas supplier certifying sulfur content and fuel bound nitrogen content of natural gas received during that semi-annual period; b) A summary and copies of certified delivery tickets from the No. 2 fuel oil supplier certifying sulfur and fuel bound nitrogen content for each load received during that semi-annual period; and c) Semi-annual excess emissions report for the Combustion Turbines and HRSG Units.	Semi-annually, by January 31st and July 31st for the preceding 6-month period, to DES and EPA	Facility Wide	Temporary Permit FP-T-0051 Federally Enforceable
9.	The Permittee shall submit an annual fuel usage report indicating consecutive 24-hour period and consecutive 12 month rolling totals of fuel utilization for the four boilers and corresponding fuel information as outlined in Condition VIII.E., Table 7, Item 7.	Annually (no later than April 15th of the following year), to DES	EU01, EU02, EU03 & EU04	Env-A 901.09 Federally Enforceable

Table 10 – Applicable Reporting Requirements				
Item #	**Reporting Requirements**	**Frequency of Reporting**	**Applicable Emission Unit**	**Regulatory Cite**
10.	The Permittee shall submit an annual fuel usage report indicating consecutive 24-hour period and consecutive 12 month rolling totals of fuel utilization for the emergency generator and corresponding fuel information as outlined in Condition VIII. E, Table 7, Item 8.	Annually (no later than April 15th of the following year), to DES	EU05	Env-A 901.09 Federally Enforceable
11.	NO_x Reporting Requirements: For each combustion device, the owner or operator shall submit to the director, in accordance with the schedule in Env-A 909.02(a), reports of the data required pursuant to Env-A 905.	Annually (no later than April 15th of the following year), to DES	Facility Wide	Temporary Permit FP-T-0051 Env-A 909.03(a) Federally Enforceable
12.	VOC Emissions Statement Reporting Requirements: (a) The owner or operator of any stationary source or device subject to the reporting requirements of this part shall submit the following information to the director in accordance with the schedule set-forth in Env-A 908.02, above: (1) Facility information, including: a. Source name; b. Standard Industrial Classification (SIC) code; c. Physical address; and d. Mailing address; (2) Identification of each VOC-emitting process or device operating at the source identified in (a)(1), above; (3) Operating schedule during the high ozone season for each VOC-emitting process or device identified in (a)(2), above, including; a. Hours of operation per calendar day; and b. Days of operation per calendar week; and (4) Total quantities of actual VOC emissions for the entire facility and for each process or device identified in (a)(2), above, including: a. Annual VOC emissions, in tons; and b. Typical high ozone season day VOC emissions, in pounds per day.	Annually (no later than April 15th of the following year), to DES	Facility Wide	Temporary Permit FP-T-0051 Env-A 908.03 Federally Enforceable

Table 10 – Applicable Reporting Requirements				
Item #	**Reporting Requirements**	**Frequency of Reporting**	**Applicable Emission Unit**	**Regulatory Cite**
13.	GPB shall submit an annual emissions report to DES on or before April 15th for the preceding calendar year. The annual emissions report shall include the following information as per Env-A 907.01(b): 1. The actual emissions of the stationary source, area source, or device and the methods used in calculating such emissions in accordance with Env-A 704.02; 2. For process operations, all information in accordance with Env-A 903.02; 3. For combustion devices, all information in accordance with Env-A 903.03; and 4. The actual annual emissions speciated by individual regulated air pollutants, including a breakdown of volatile organic compound (VOC) emissions by compound.	Annually (no later than April 15th of the following year), to DES	Facility Wide	Temporary Permit FP-T-0051 Env-A 907.01 Federally Enforceable
14.	Each owner or operator of a source subject to Subpart S shall comply with the reporting requirements of Subpart A of this part as specified in Table 1 of 40 CFR 63 Subpart S.	As stated, to DES and EPA	EU8 & EU9	40 CFR 63 Subpart S Section 63.455(a)
15.	Alternative Control Option Reporting Requirements – Quarterly Excess Emissions Report: GPB shall submit a quarterly excess emissions report to DES containing the following information: a) Operating hours during the quarter where the effluent treatment plant was below the minimum removal efficiency. Any occurrence or sum of occurrences above 1% of the total time in the quarter would be considered an excess emission; b) Operating hours during the quarter where the blow heat condenser vent valve was open. Any occurrence or sum of occurrences above 1% of the total time in the quarter would be considered an excess emission; and c) Operating hours during the quarter when any alternative operating parameter value is outside of the operating range established during the performance test for establishing such operating parameter ranges. Any occurrence or sum of occurrences above 1% of the total process operating time in the quarter would be considered an excess emission.	Within 30 calendar days after the end of each quarterly calendar period, to DES and EPA	EU8 & EU9	Equivalency By Permit 40 CFR 63 Section 63.94 Federally Enforceable

Table 10 – Applicable Reporting Requirements				
Item #	**Reporting Requirements**	**Frequency of Reporting**	**Applicable Emission Unit**	**Regulatory Cite**
16.	Alternative Control Option – Quarterly Performance Summary: GPB shall submit a quarterly report to DES containing the following information: a) Weekly effluent treatment plant BOD removal efficiency. b) Summary of duration of daily blow heat condenser system vent valve being open report. c) Data and summary of quarterly methanol emissions reductions as described in the Monitoring section.	Within 30 calendar days after the end of each quarterly calendar period, to DES and EPA	EU8 & EU9	Equivalency By Permit 40 CFR 63 Section 63.94 Federally Enforceable
17.	Notifications – Recovery Kiln: GPB must submit the applicable notifications from 40 CFR 63 Subpart A, as specified in Table 1 of 40 CFR 63 Subpart MM. This would include, but not be limited to 40 CFR 63 Section 63.7(b)(1) – Notification of Performance Test, Section 63.8(e)(2) – Notification of Performance Evaluation, Section 63.8(e)(3) – Submission of site-specific performance evaluation test plan, Section 63.8(e)(5) – Reporting performance evaluation results, Section 63.9(b) – Initial notifications, Section 63.9(e) – Notification of performance test, and Section 63.9(h) Notification of compliance status.	As stated in relevant standards applicable in Table 1 of 40 CFR 63 Subpart MM, to DES and EPA	EU7	40 CFR 63 Subpart MM Section 63.867(a) Federally Enforceable
18.	Excess Emissions Report – Recovery Kiln GPB must report quarterly if measured parameters meet any of the conditions specified in paragraphs (c)(1) or (2) of Section 63.864, i.e. any 3-hour average outside the operating parameter range in 63.864(b)(2) and if six or more 3-hour averages within any 6-month reporting period are outside the range of parameter values. This report must contain the information specified in Section 63.10(c) of 40 CFR 63 as well as the number and duration of occurrences when the source met or exceeded the conditions in Section 63.864(c)(1), and the number and duration of occurrences when the source met or exceeded the conditions in Section 63.864(c)(2). Reporting excess emissions below the violation thresholds of Section 63.864(c) does not constitute a violation of the applicable standard. 1. When no exceedances of parameters have occurred, GPB must submit a semiannual report stating that no excess emissions occurred during the reporting period. 2. In that GPB is Subject to 40 CFR 63 Subpart S, it may combine excess emissions and/or summary reports for the recovery kiln with the alternative control option for the LVHC sources. *** Note that this condition is not effective until March 13, 2004.**	As stated, to DES and EPA	EU7	40 CFR 63 Subpart MM Section 63.867(c) Federally Enforceable

Table 10 – Applicable Reporting Requirements				
Item #	**Reporting Requirements**	**Frequency of Reporting**	**Applicable Emission Unit**	**Regulatory Cite**
19.	Prompt reporting of deviations from Permit requirements shall be conducted in accordance with Section XXVIII of this Permit.	Prompt reporting (within 24 hours of an occurrence), to DES	Facility Wide	40 CFR 70.6(a)(3)(iii)(B) Federally Enforceable
20.	Any report submitted to the DES and/or EPA shall include the certification of accuracy statement outlined in Section XXI.B. of this Permit and shall be signed by the responsible official.	As specified in section XXI. B.	Facility Wide	40 CFR 70.6(c)(1) Federally Enforceable
21.	Annual reporting and payment of emission based fees for pollutants, including but not limited to SO_2, NO_x, CO, TSP, VOCs and New Hampshire Regulated Air Toxic Pollutant (NHRATP) emissions, shall be conducted in accordance with Section XXIII of this Permit.	Annually (no later than April 15th of the following year), to DES	Facility Wide	Env-A 704.03 Federally Enforceable
22.	Annual compliance certification shall be submitted in accordance with Section XXI of this Permit.	Annually (no later than April 15th of the following year), to DES and EPA	Facility Wide	40 CFR 70.6(c)(1) Federally Enforceable

I. Compliance Plan

In addition to the above state and federally enforceable requirements, GPB shall adhere to the schedule put forth below to bring it into compliance with 40 CFR 63 Subpart S or any approved alternative permit terms under Section 63.94 by April 15, 2002. GPB shall submit progress reports to DES upon completion of the major milestones as detailed in the Compliance Plan schedule listed below. If milestone dates shall not be met or are not met, GPB shall submit to DES and EPA in writing, the reasons and a good faith estimate of completion.

Description of Action Required	Completion Date
Obtain EPA approval of alternative control option through Joint EPA/State Agreement to Pursue Regulatory Innovation	On or before March 31, 2001
Obtain EPA approval for use of the Equivalency By Permit (40 CFR 63.94) as the legally enforceable mechanism for incorporating alternative permit terms and conditions, which are at least as stringent as the otherwise applicable Federal requirements.	On or before June 30, 2001

Conduct Pre-Testing as outlined Table 7 – Pre-Test Requirements and complete process modifications, installation, calibration, and operation of monitoring equipment	On or before April 15**,** 2002
Submit Pre-Testing results	30 days after Pre-Testing Completed
Conduct the Performance Test as outlined in Table 8 - Performance Testing Requirements. Submit performance test results and selected alternative parameters to be monitored and operating ranges which shall demonstrate continuous compliance for a permit amendment to the Title V Operating Permit, in accordance with Env-A 612.04.	On or before October 15,2002
If the monitoring and testing results show methanol emission reductions are less than required by the 40 CFR 63 Subpart S, then the permit shall be reopened and terms and conditions written to reflect the requirements of 40 CFR 63 Subpart S.	

IX. Requirements Currently Not Applicable:

Requirements not currently applicable to the facility were not identified by the Permittee.

General Title V Operating Permit Conditions

X. Issuance of a Title V Operating Permit:

A. This Permit is issued in accordance with the Provisions of Part Env-A 609. In accordance with 40 CFR 70.6(a)(2) this Permit shall expire on the date specified on the cover page of this Permit, which shall not be later than the date five (5) years after issuance of this Permit.
B. Permit expiration terminates the Permitee's right to operate the Permitee's emissions units, control equipment or associated equipment covered by this permit, unless a timely and complete renewal application is submitted at least 6 months before the expiration date.
C. Pursuant to Env-A 609.02(b), this Permit shall be a state permit to operate as defined in RSA 125-C:11, III.

XI. Title V Operating Permit Renewal Procedures:

Pursuant to Env-A 609.06(b), an application for renewal of this Permit shall be considered timely if it is submitted to the Director at least six months prior to the designated expiration date of this Permit.

XII. Application Shield:

Pursuant to Env-A 609.07, if an applicant submits a timely and complete application for the issuance or renewal of a Permit, the failure to have a Permit shall not be considered a violation of this part until the Director takes final action on the application.

XIII. Permit Shield:

A. Pursuant to Env-A 609.08(a), a permit shield shall provide that:

1. For any applicable requirement or any state requirement found in the New Hampshire Rules Governing the Control of Air Pollution specifically included in this Permit, compliance with the conditions of this Permit shall be deemed compliance with said applicable requirement or said state requirement as of the date of permit issuance; and

2. For any potential applicable requirement or any potential state requirement found in the New Hampshire Rules Governing the Control of Air Pollution specifically identified in this Title V Operating Permit Section IX Table 8 as not applicable to the stationary source or area source, the Permittee need not comply with the specifically identified federal or state requirements.

B. The permit shield identified in Section XIII. of this Permit shall apply only to those conditions incorporated into this Permit in accordance with the provisions of Env-A 609.08(b). It shall not apply to certain conditions as specified in Env-A 609.08(c) that may be incorporated into this Permit following permit issuance by DES.

C. If a Title V Operating Permit and amendments there to issued by the DES does not expressly include or exclude an applicable requirement or a state requirement found in the NH Rules Governing the Control of Air Pollution, that applicable requirement or state requirement shall not be covered by the permit shield and the Permittee shall comply with the provisions of said requirement to the extent that it applies to the Permittee.

D. If the DES determines that this Title V Operating Permit was issued based upon inaccurate or incomplete information provided by the applicant or Permittee, any permit shield provisions in said Title V Operating Permit shall be void as to the portions of said Title V Operating Permit, which are affected, directly or indirectly, by the inaccurate or incomplete information.

E. Pursuant to Env-A 609.08(f), nothing contained in Section XIII of this Permit shall alter or affect the ability of the DES to reopen this Permit for cause in accordance with Env-A 609.18 or to exercise its summary abatement authority.

F. Pursuant to Env-A 609.08(g), nothing contained in this section or in any Title V Operating Permit issued by the DES shall alter or affect the following:

1. The ability of the DES to order abatement requiring immediate compliance with applicable requirements upon finding that there is an imminent and substantial endangerment to public health, welfare, or the environment;

2. The state of New Hampshire's ability to bring an enforcement action pursuant to RSA 125-C:15, II;

3. The provisions of section 303 of the Act regarding emergency orders including the authority of the EPA Administrator under that section;

4. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

5. The applicable requirements of the acid rain program, consistent with section 408(a) of the Act;

6. The ability of the DES or the EPA Administrator to obtain information about a stationary source, area source, or device from the owner or operator pursuant to section 114 of the Act; or

7. The ability of the DES or the EPA Administrator to enter, inspect, and/or monitor a stationary source, area source, or device.

XIV. Reopening for Cause

The Director shall reopen and revise a Title V Operating Permit for cause if any of the circumstances contained in Env-A 609.18(a) exist. In all proceedings to reopen and reissue a Title V Operating Permit, the Director shall follow the provisions specified in Env-A 609.18(b) through (g).

XV. Administrative Permit Amendments

A. Pursuant to Env-A 612.01, the Permittee may implement the changes addressed in the request for an administrative permit amendment as defined in Part Env-A 100 immediately upon submittal of the request.

B. Pursuant to Env-A 612.01, the Director shall take final action on a request for an administrative permit amendment in accordance with the provisions of Env-A 612.01(b) and (c).

XVI. Operational Flexibility

A. Pursuant to Env-A 612.02(a), the Permittee subject to and operating under this Title V Operating Permit may make changes involving trading of emissions under this existing Title V Operating Permit at the permitted stationary source or area source without filing a Title V Operating Permit application for and obtaining an amended Title V Operating Permit, provided that all the conditions are met as specified in section XVI. A. 1. through 7. of this permit and a notice is submitted to the DES and EPA describing the intended changes. At this point, DES has not included any permit terms authorizing emissions trading in this permit.

1. The change is not a modification under any provision of title I of the Act;
2. The change does not cause emissions to exceed the emissions allowable under the Title V Operating Permit, whether expressed therein as a rate of emissions or in terms of total emissions;
3. The owner or operator has obtained any temporary permit required by Env-A 600;
4. The owner or operator has provided written notification to the director and administrator at least 15 days prior to the proposed change and such written notification includes:
   a.) The date on which each proposed change will occur;
   b.) A description of each such change;
   c.) Any change in emissions that will result and how this change in emissions will comply with the terms and conditions of the permit;
   d.) A written request that the operational flexibility procedures be used; and
   e.) The signature of the responsible official, consistent with Env-A 605.04(b);
5. The Title V Operating Permit issued to the stationary source or area source already contains terms and conditions including all terms and conditions which determine compliance required under 40 CFR 70.6(a) and (c) and which allow for the trading of emissions increases and decreases at the permitted stationary source or area source solely for the purpose of complying with a federally-enforceable emissions cap that is established in the permit independent of otherwise applicable requirements;
6. The owner or operator has included in the application for the Title V Operating Permit proposed replicable procedures and proposed permit terms which ensure that the emissions trades are quantifiable and federally enforceable for changes to the Title V Operating Permit which qualify under a federally- enforceable emissions cap that is established in the Title V Operating Permit independent of the otherwise applicable requirements; and
7. The proposed change complies with Env-A 612.02 (e).

B. Pursuant to Env-A 612.02(c), the Permittee subject to and operating under this Title V Operating Permit may make changes not addressed or prohibited by this existing Title V Operating Permit at the permitted stationary source or area source without filing a Title V Operating Permit application,

provided that all the conditions specified in Env-A 612.02(c)(1) through (6) are met and a notice is submitted to the DES and EPA describing the intended changes.

C. Pursuant to Env-A 612.02(d), the Permittee, Operator, Director and Administrator shall attach each notice of an off-permit change completed in accordance with Section XVI of this Title V Operating Permit to their copy of the current Title V Operating Permit.

D. Pursuant to Env-A 612.02(e), any change under Section XVI shall not exceed any emissions limitations established under the NH Rules Governing the Control of Air Pollution, or result in an increase in emissions, or result in new emissions, of any toxic air pollutant or hazardous air pollutant other than those listed in the existing Permit.

E. Pursuant to Env-A 612.02(f), the off-permit change shall not qualify for the permit shield under Env-A 609.08.

XVII. Minor Permit Amendments

A. Pursuant to Env-A 612.04 prior to implementing a minor permit modification, the Permittee shall submit a written request to the Director in accordance with the requirements of Env-A 612.04(b).

B. The Director shall take final action on the minor permit amendment request in accordance with the provisions of Env-A 612.04(c) through (g).

C. Pursuant to Env-A 612.04(g), the permit shield specified in Env-A 609.08 shall not apply to minor permit amendments under Section XVII. of this Permit.

D. Pursuant to Env-A 612.04(I), the Permittee shall be subject to the provisions of Part Env-A 614 and Part Env-A 615 if the change is made prior to the filing with the Director a request for a minor permit amendment.

XVIII. Significant Permit Amendments

A. Pursuant to Env-A 612.05, a change at the facility shall qualify as a significant permit amendment if it meets the criteria specified in Env-A 612.05(a)(1) through (7).

B. Prior to implementing the significant permit amendment, the Permittee shall submit a written request to the Director, which includes all the information as referenced in Env-A 612.05(b) and (c) and shall be issued an amended Title V Operating Permit from the DES. The Permittee shall be subject to the provisions of Env-A 614 and Env-A 615 if a request for a significant permit amendment is not filed with the Director and/or the change is made prior to the issuance of an amended Title V Operating Permit.

C. The Director shall take final action on the significant permit amendment in accordance with the Procedures specified in Env-A 612.05(d), (e) and (f).

XIX. Title V Operating Permit Suspension, Revocation or Nullification

A. Pursuant to RSA 125-C:13, the Director may suspend or revoke any final permit issued hereunder if, following a hearing, the Director determines that:

1. The Permittee has committed a violation of any applicable statute or state requirement found in the New Hampshire Rules Governing the Control of Air Pollution, order or permit condition in force and applicable to it; or

2. That the emissions from any device to which this Permit applies, alone or in conjunction with other sources of the same pollutants, presents an immediate danger to the public health.

B. The Director shall nullify any Permit, if following a hearing in accordance with RSA 541-A:30, II, a finding is made that the Permit was issued in whole or in part based upon any information proven to be intentionally false or misleading.

XX. Inspection and Entry

Pursuant to Env-A 614.01, EPA and DES personnel shall be granted access to the facility covered by this Permit, in accordance with RSA 125-C:6,VII for the purposes of: inspecting the proposed or permitted site; investigating a complaint; and assuring compliance with any applicable requirement or state requirement found in the NH Rules Governing the Control of Air Pollution and/or conditions of any Permit issued pursuant to Chapter Env-A 600.

XXI. Certifications

A. Compliance Certification Report

In accordance with 40 CFR 70.6(c) the Responsible Official shall certify, for the previous calendar year, that the facility is in compliance with the requirements of this permit. The report shall be submitted annually, no later than April 15th of the following year. The report shall be submitted to the DES and to the U.S. Environmental Protection Agency - New England Region. The report shall be submitted in compliance with the submission requirements below.

In accordance with 40 CFR 70.6(c)(5), the report shall describe:

1. The terms and conditions of the Permit that are the basis of the certification;
2. The current compliance status of the source with respect to the terms and conditions of this Permit, and whether the method was continuous or intermittent during the reporting period;
3. The methods used for determining compliance, including a description of the monitoring, record keeping, and reporting requirements and test methods; and
4. Any additional information required by the DES to determine the compliance status of the source.

B. Certification of Accuracy Statement

All documents submitted to the DES shall contain a certification of accuracy statement by the responsible official of truth, accuracy, and completeness. Such certification shall be in accordance with the requirements of 40 CFR 70.5(d) and contain the following language:

"I am authorized to make this submission on behalf of the facility for which the submission is made. Based on information and belief formed after reasonable inquiry, I certify that the statements and information in the enclosed documents are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment."

All reports submitted to DES (except those submitted as emission based fees as outlined in Section XXIII of this Permit) shall be submitted to the following address:

New Hampshire Department of Environmental Services
Air Resources Division
6 Hazen Drive
P.O. Box 95
Concord, NH 03302-0095
ATTN: Compliance Bureau

All reports submitted to EPA shall be submitted to the following address:

Office of Environmental Stewardship
Director Air Compliance Program
United States Environmental Protection Agency
1 Congress Street
Suite 1100 (SEA)
Boston, MA 02114-2023
ATTN: Air Compliance Clerk

XXII. Enforcement

Any noncompliance with a permit condition constitutes a violation of RSA 125-C:15, and, as to the conditions in this permit which are federally enforceable, a violation of the Clean Air Act, 42 U.S.C. Section 7401 et seq., and is grounds for enforcement action, for permit termination or revocation, or for denial of an operating permit renewal application by the DES and/or EPA. Noncompliance may also be grounds for assessment of administrative, civil or criminal penalties in accordance with RSA 125-C:15 and/or the Clean Air Act. This Permit does not relieve the Permittee from the obligation to comply with any other provisions of RSA 125-C, the New Hampshire Rules Governing the Control of Air Pollution, or the Clean Air Act, or to obtain any other necessary authorizations from other governmental agencies, or to comply with all other applicable Federal, State, or Local rules and regulations, not addressed in this Permit.

In accordance with 40 CFR 70.6 (a)(6)(ii) a Permittee shall not claim as a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this Permit.

XXIII. Emission-Based Fee Requirements

A. The Permittee shall pay an emission-based fee annually for this facility as calculated each calendar year pursuant to Env-A 704.03.
B. The Permittee shall determine the total actual annual emissions from the facility to be included in the emission-based multiplier specified in Env-A 704.03(a) for each calendar year in accordance with the methods specified in Env-A 620.
C. The Permittee shall calculate the annual emission-based fee for each calendar year in accordance with the procedures specified in Env-A 704.03 and the following equation:

$$FEE = E * DPT * CP\,\text{Im} * ISF$$

Where:

FEE =	The annual emission-based fee for each calendar year as specified in Env-A 704.
E =	The emission-based multiplier is based on the calculation of total annual emissions as specified in Env-A 704.02 and the provisions specified in Env-A 704.03(a).
DPT =	The dollar per ton fee the DES has specified in Env-A 704.03(b).
CPIm=	The Consumer Price Index Multiplier as calculated in Env-A 704.03(c).
ISF =	The Inventory Stabilization Factor as specified in Env-A 704.03(d).

D. The Permittee shall contact the DES each calendar year for the value of the Inventory Stabilization Factor and for the value of the Consumer Price Index Multiplier.
E. The Permittee shall submit, to the DES, payment of the emission-based fee and a summary of the calculations referenced in paragraphs 2 and 3 in Section XXIII. of this Permit for each calendar year

by October 15th of the following calendar year in accordance with Env-A 704.04. The emission-based fee and summary of the calculations shall be submitted to the following address:

New Hampshire Department of Environmental Services
Air Resources Division
6 Hazen Drive
P.O. Box 95
Concord, NH 03302-0095
ATTN.: Emissions Inventory

F. The DES shall notify the Permittee of any under payments or over payments of the annual emission-based fee in accordance with Env-A 704.05.

XXIV. Duty To Provide Information

In accordance with 40 CFR 70.6 (a)(6)(v), upon the DES's written request, the Permittee shall furnish, within a reasonable time, any information necessary for determining whether cause exists for modifying, revoking and reissuing, or terminating the Permit, or to determine compliance with the Permit. Upon request, the Permittee shall furnish to the DES copies of records that the Permittee is required to retain by this Permit. The Permittee may make a claim of confidentiality as to any information submitted pursuant to this condition in accordance with Part Env-A 103 at the time such information is submitted to DES. DES shall evaluate such requests in accordance with the provisions of Part Env-A 103.

XXV. Property Rights

Pursuant to 40 CFR 70.6 (a)(6)(iv), this Permit does not convey any property rights of any sort, or any exclusive privilege.

XXVI. Severability Clause

Pursuant to 40 CFR 70.6 (a)(5), the provisions of this Permit are severable, and if any provision of this Permit, or the application of any provision of this Permit to any circumstances is held invalid, the application of such provision to other circumstances, and the remainder of this Permit, shall not be affected thereby.

XXVII. Emergency Conditions

Pursuant to 40 CFR 70.6(g), the Permittee shall be shielded from enforcement action brought for noncompliance with technology based[3] emission limitations specified in this Permit as a result of an emergency[4]. In order to use emergency as an affirmative defense to an action brought for noncompliance, the Permittee shall demonstrate the affirmative defense through properly signed, contemporaneous operating logs, or other relevant evidence that:

1. An emergency occurred and that the Permittee can identify the cause(s) of the emergency;

[3] Technology based emission limits are those established on the basis of emission reductions achievable with various control measures or process changes (e.g., a new source performance standard) rather than those established to attain health based air quality standards.

[4] An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation would require immediate corrective action to restore normal operation, and that causes the source to exceed a technology based limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operations, operator error or decision to keep operating despite knowledge of any of these things.

2. The permitted facility was at the time being properly operated;
3. During the period of the emergency, the Permittee took all reasonable steps as expeditiously as possible, to minimize levels of emissions that exceeded the emissions standards, or other requirements in this Permit; and
4. The Permittee submitted notice of the emergency to the DES within two (2) business days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emission, and corrective actions taken.

XXVIII. Permit Deviation:

In accordance with 40 CFR 70.6(a)(3)(iii)(B), the Permittee shall report to the DES all instances of deviations from Permit requirements, by telephone or fax, within 24 hours of discovery of such deviation. This report shall include the deviation itself, including those attributable to upset conditions as defined in the Permit, the probable cause of such deviations, and any corrective actions or preventative measures taken. Said Permit deviation shall also be submitted in writing to the DES in the semi-annual summary report of monitoring and testing requirements due July 31st and January 31st of each calendar year. Deviations are instances where any Permit condition is violated and has not already been reported as an emergency pursuant to Section XXVII of this Permit.

Reporting a Permit deviation is not an affirmative defense for action brought for noncompliance.